



Federal Home Loan Bank
NEW YORK

2019 DIVERSITY & INCLUSION ANNUAL REPORT



Table of Contents

Executive Summary - 2019 Highlights.....	1
Workforce Diversity	4
EEO Staffing Levels (EEO-1 Report) – §1223.23(b)(1) and §1223.23(b)(11)	5
External Applicants – §1223.23(b)(3) and §1223.23(b)(11).....	5
New Hires – §1223.23(b)(4) and §1223.23(b)(11)	6
Separations – §1223.23(b)(5) and §1223.23(b)(11).....	7
Internal Applicants – §1223.23(b)(7)(i and ii) and §1223.23(b)(11)	8
Promotions – §1223.23(b)(8)(i - iii) and §1223.23(b)(11).....	9
Supervisors and/or Managers – §1223.23(b)(9) and §1223.23(b)(11)	10
Accommodations – §1223.23(b)(6) and §1223.23(b)(11)	11
Outreach - §1223.23(b)(13) and §1223.23(b)(23)	12
Outcome Analysis - §1223.23(b)(24)	14
Future Strategy - §1223.23(b)(25)	17
Board of Directors.....	17
Board Diversity – §1223.23(b)(10)(i).....	17
Outreach Activities and Strategies - §1223.23(b)(10)(ii)	18
Outcome Analysis - §1223.23(b)(24)	18
Future Strategy - §1223.23(b)(25)	19
Supplier Diversity	19
Number of Contracts	20
Total Number of Contracts – §1223.23(b)(14).....	20
Number of Contracts Entered Into During Reporting Year by Category – §1223.23(b)(16).....	21
Amount Paid for Contracts	22
Total Amount Paid – §1223.23(b)(15)	22
Amount Paid for Contracts Entered Into During the Reporting Year by Category – §1223.23(b)(17).....	22
Annual Spend	23
Diverse Spend with Non-Diverse-Owned Businesses – §1223.23(b)(18)	23
Annual Spend by Category – §1223.23(b)(19)	24
Outreach - §1223.23(b)(13) and §1223.23(b)(23)	24
Outcome Analysis - §1223.23(b)(24)	27
Future Strategy - §1223.23(b)(25)	28

Financial Transactions.....	28
Strategies, Initiatives, and Activities - §1223.23(b)(12)(ii).....	30
Outreach - §1223.23(b)(13) and §1223.23(b)(23)	32
Outcome Analysis - §1223.23(b)(24)	33
Future Strategy - §1223.23(b)(25)	35
Housing and Community Investment	35
Outreach - §1223.23(b)(12)(i)	35
Outcome Analysis - §1223.23(b)(24)	36
Future Strategy - §1223.23(b)(25)	37
Equal Opportunity Complaints.....	38
Employment Discrimination - §1223.23(b)(21) and §1223.23(b)(22)	38
Contract Discrimination - §1223.23(b)(21) and §1223.23(b)(22)	38
Other Reports/Plans – §1223.23(b)(2) and §1223.23(b)(11).....	1
Certification - §1223.23(a) and §1223.23(b)(20)	1
Appendix	i

Executive Summary - 2019 Highlights

2019 proved to be another strong year for diversity and inclusion (“D&I”) initiatives for the Federal Home Loan Bank of New York (“FHLBNY” or “Bank”) as evidenced by the contents included in the 2019 Annual Report (“Report”). A summary of achievements are as follows:

Strategic Plan

- ✚ D&I was included in the Bank’s 3-year Strategic Plan (2019-2021).
 - ✓ The Strategic Plan includes Aspirational Targets (“Targets”) and Yearly Checkpoints (“Checkpoints”) for Capital Markets, Procurement, and Employment activities to help the Bank on a “best efforts basis” to measure progress towards achieving our objectives.
 - ✓ We maintained or exceeded most of our 2019 Checkpoints in these three areas. Where Checkpoints were not met, plans are in place to help achieve the Targets.

Governance

- ✚ The Board of Directors (“Board”) approved amended and enhanced versions of the D&I Communication Plan (“Communication Plan”), D&I Capital Markets Program (“Capital Markets Program”), D&I Procurement Program (“Procurement Program”) and the D&I Employment Program (“Employment Program”).
 - ✓ The Communication Plan is designed to communicate the Bank’s D&I commitment, efforts, and activities to the Federal Housing Finance Agency (“FHFA”), Board of Directors, Management Committee, current and future employees, and current and future business partners.
 - ✓ The Capital Markets Program and the Procurement Program are designed to provide a framework for the Bank’s D&I commitment efforts and activities related to governance, outreach, education and opportunities provided to Minority, Women, and Disabled-Owned (“MWDO”) Broker/Dealers and Minority, Women, and Disabled-Owned Businesses (“MWDOBs”).
 - ✓ The Employment Program is designed to communicate the various channels used throughout the employment cycle to help ensure that diversity and inclusion is embedded in the Bank’s outreach, recruitment, hiring, performance management, learning and development, promotion, and succession planning processes.

Workforce Diversity

- ✚ The Bank hosted the first ever “*Building a Diversified Network with the FHLBNY*” in September. This event was the first by the Bank that’s designed with the objective of creating a brand as an employer of choice. Attendees learned about the future needs in finance, risk, and technology from a panel of executives that discussed the skills needed to keep candidates relevant as they navigate their careers.
 - ✓ Attendees were able to:
 - Listen and learn from a certified international executive coach regarding personal branding;
 - Observe a panel featuring FHLBNY C-suite Executives and Board Members; and

- Meet and network with peers from various industries and with executives from the FHLBNY.

We will continue to host these type of recruiting events in the future.

- ✚ In 2019, the Bank established a relationship with the Computer Science Co-Op Program at the [REDACTED]. The Bank hosted two interns through the course of six months and hired one diverse student to the Software Quality Engineering Team.

Supplier Diversity

- ✚ The Bank is committed to establishing strong relationships with our business partners and actively promoting opportunities for certified MWDOBs. We see diversity as a competitive strength that helps us leverage our differences to be the best. Partnering with MWDOBs helps us to grow our pool of suppliers, provide opportunities to diverse businesses, and to fulfill our customers' needs and expectations.
 - ✓ In 2019, the Bank entered into 623 relationships with all vendors. Of those relationships, 160 (26%) were awarded to MWDOBs for the purchase of goods and services. The total relationships with MWDOBs increased from 154 in 2018 to 160 in 2019.
 - ✓ In 2019, the Bank's total spend with MWDOB's was \$22.11 million. This was a decrease of \$4.71 million from 2018 expenditures of \$26.82 million.

Financial Institutions

Liabilities

- ✚ During 2019, the Bank entered into 380 transactions of negotiated bond and Discount Note ("DN") issuance with 21 (including one merged firm) MWDO Broker/Dealers. The total discretionary Consolidated Obligation issuance, including the DN Window trades, increased to \$24.1 billion in 2019 from \$21.5 billion in 2018. Bond investments decreased with ten trades among three MWDO Broker/Dealers for a total of \$1.125 billion of securities in 2019.
- ✚ Fees paid on an overall basis increased, despite the reduction in concession for DN executed in the DN Window, as the Bank increased its volume and the System paid fees to the MWDO Broker/Dealers on the syndicated issuance of Secured Overnight Financing Rate ("SOFR") floaters.

Assets

- ✚ Bond investments decreased with ten trades among three MWDO Broker/Dealers for a total of \$1.125 billion of securities in 2019.
- ✚ Mortgage Backed Securities investment activity, though greater than in 2018 in terms of notional and number of firms, was depressed as the Bank forwent purchasing bonds associated with LIBOR and thereby decreasing the number of available trade opportunities. In 2019, activity included sixteen trades with nine MWDO Broker/Dealers for a total of \$142 million.
- ✚ 2019 witnessed an increase in the number of firms involved and in the notional of the trades.

Housing and Community Investment

- ✚ The Affordable Housing Program identified, interviewed, and selected three women to join the Affordable Housing Advisory Council (“AHAC”) that will advocate for their areas of expertise and geography. One member was elected vice-chair of the AHAC. Now, over 60% of the AHAC is comprised of women.

Workplace Inclusion Committee

- ✚ A Workplace Inclusion Survey was sent to all employees in 2019 to ask for their definition of workplace inclusion. Several themes gleaned from their responses included 1) Access and Opportunities, 2) Sense of Belonging and Fair Treatment, 3) Culture and Recognition, and 4) Communication and Networking.
 - ✓ As a result, a Workplace Inclusion Committee (“Committee”) was established with the goal of identifying proposed objectives aligned with these themes to help enhance inclusion at the Bank. The Committee members volunteered their time and are made up of employees from various departments, ranks, tenure, gender, race, and office locations.
 - ✓ The Committee developed some proposed objectives that included 1) establishing a formal mentoring program for all employees; 2) exploring the establishment of Employee Resource Groups; 3) identifying Holidays/Heritage Months to be recognized and/or celebrated by the Bank; and 4) providing additional inclusion training for all employees.

D&I Program Oversight

- ✚ As the result of an FHFA Office of Minority, Women Inclusion Examination, the Bank was issued three Matters Requiring Attention (“MRAs”) – two in Procurement and one related to governance. All three MRAs were remediated prior to year-end.
- ✚ The Bank’s Internal Audit department completed its review of the Bank’s Diversity & Inclusion Program in December and identified several areas that required enhancement that included the accuracy and consistency of reporting and performing an independent gap analysis of the Diversity and Inclusion Annual Report template provided by the FHFA in 2018 to help ensure alignment with the Minority Women and Inclusion (“MWI”) regulations. Some of the findings were remediated in 2019 and other findings will be worked on in 2020.

Reporting and Metrics

The Bank began to explore Robotic Process Automation (“RPA”), and other automated solutions, in an effort to help reduce the level of manual labor required for data reporting and to enhance data integrity.

Workforce Diversity

At the FHLBNY, the ideals of mutual respect, teamwork, and serving the diverse communities in our district are at the core of our corporate culture and are the driving force behind our diversity and inclusion efforts. Our collaborative approach to diversity and inclusion also helps facilitate and strengthen the relationships we have with our employees and business partners.

We achieve our diversity and inclusion mission by advocating for access to career and development opportunities that lead to leadership positions for employees, and by engaging in outreach to, and education of our minority, women, and disabled-owned business partners to help improve opportunities to grow their businesses and succeed.

How We Will Achieve Our Diversity & Inclusion Mission

At the FHLBNY, we:

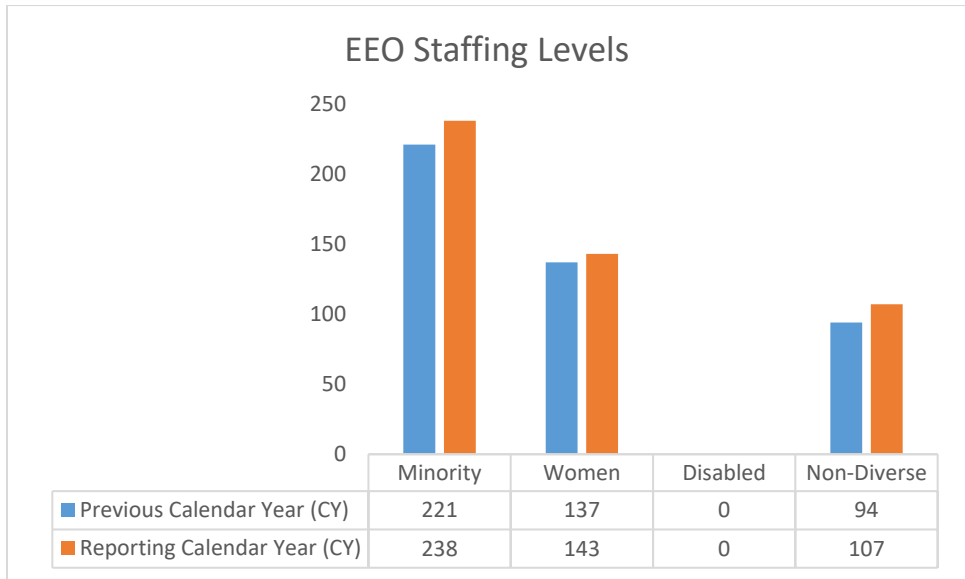
- ✚ Help ensure that women, minority, and individuals with disabilities are considered for leadership and other positions at the FHLBNY when there is an open position and/or FHLBNY reorganization;
- ✚ Expand identification of “High Potential” employees from the FHLBNY’s diverse pool of talent, to help ensure that they are developed for future leadership positions at the FHLBNY;
- ✚ Expand minority, women, and disabled-owned businesses supplier outreach and education of the FHLBNY’s business needs and activities; and
- ✚ Keep diversity and inclusion in the forefront of the senior management team by providing dashboards, metrics and analytics on diversity and inclusion, MWDOB outreach efforts, and spend.

Workforce Diversity is included in the Bank’s 3-year Strategic Plan. Targets were identified to help enhance the number of Black or African American, Hispanic or Latino, and Disabled applicants and new hires. The table below includes the Checkpoints and Targets. As of 2019, the Bank met its Checkpoints for Black or African American applicants and new hires. The Bank did not meet the Checkpoints for Hispanic or Latino and Disabled applicants and new hires. Through continued targeted outreach programs, the Bank is focused on increasing these numbers in 2020.

Aspirational Targets						
Number of Applicants for Open Positions	Average 2016-2018	2019 Checkpoint	2020 Checkpoint	2021 Checkpoint	Aspirational Targets	2019 Q4 Results
Black or African American	10%	14%	16%	18%	18%	20%
Hispanic or Latino	8%	10%	12%	13%	13%	7%
Disabled	0%	2%	2%	2%	2%	0%
Number of New Hires	Average 2016-2018	2019 Checkpoint	2020 Checkpoint	2021 Checkpoint	Aspirational Targets	2019 Q4 Results
Black or African American	18%	14%	15%	16%	16%	17%
Hispanic or Latino	9%	12%	13%	14%	14%	11%
Disabled	0%	1%	2%	2%	2%	0%

EEO Staffing Levels (EEO-1 Report) – §1223.23(b)(1) and §1223.23(b)(11)

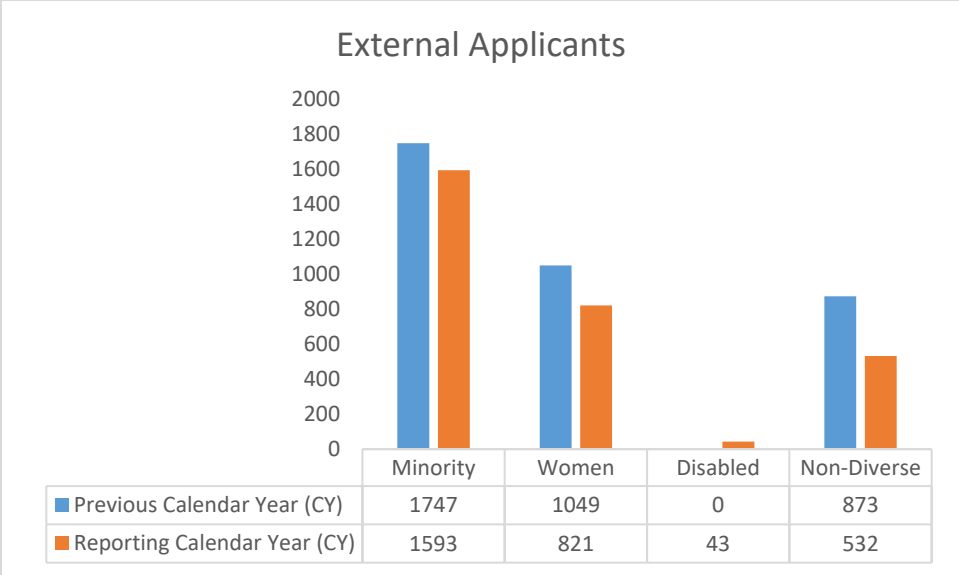
- ✚ In 2018, the Bank’s employee headcount was 315 employees. Of the 315 employees, 137 were women and 221 were diverse.
- ✚ In 2019, the Bank’s employee headcount was 345 employees. Of the 345 employees, 143 were women and 238 were diverse.
 - ✓ Observation: The number of women and diverse employees has increased between 2018 and 2019.



- Note 1:** Non-Diverse refers to individuals that are not minorities, women, or disabled.
- Note 2:** Double counting may occur for individuals that are classified under more than one category of minority, women, or disabled.
- Note 3:** Minority includes American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Two or More Races, Native Hawaiian or Pacific Islander and White Women.
- Note 4:** Raw data is available in the Appendix section.

External Applicants – §1223.23(b)(3) and §1223.23(b)(11)

- ✚ In 2018, there were 3,304 external applicants that self-identified. Of these applicants, 1,049 were women and 1,747 were diverse.
- ✚ In 2019, there were 2,125 external applicants that self-identified. Of these applicants, 821 were women and 1,593 were diverse.
 - ✓ Observation: The number of women and diverse applicants has decreased in 2019 as compared to 2018.



Note 1: Non-Diverse refers to individuals that are not minorities, women, or disabled.

Note 2: Double counting may occur for individuals that are classified under more than one category of minority, women, or disabled.

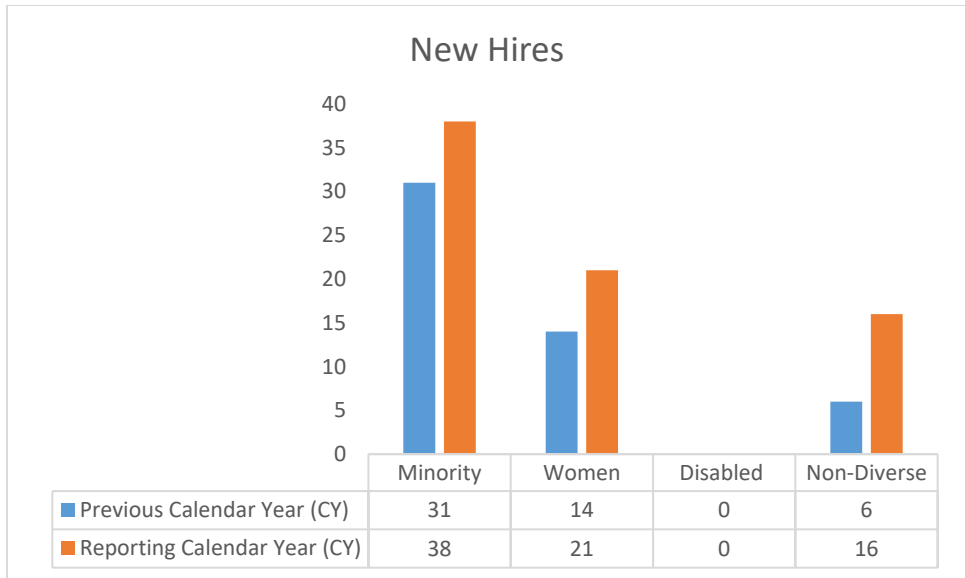
Note 3: Minority includes American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Two or More Races, Native Hawaiian or Pacific Islander and White Women.

Note 4: Raw data is available in the Appendix section.

Note 5: The chart includes only applicants who self-identified both race and gender.

New Hires – §1223.23(b)(4) and §1223.23(b)(11)

- ✚ In 2018, the Bank hired 37 new employees. Of those hired, 14 were women and 31 were diverse.
- ✚ In 2019, the Bank hired 54 new employees. Of those hired, 21 were women and 38 were diverse.
 - ✓ Observation: The number of women and diverse new hires has increased between 2018 and 2019.



Note 1: Non-Diverse refers to individuals that are not minorities, women, or disabled.

Note 2: Double counting may occur for individuals that are classified under more than one category of minority, women, or disabled.

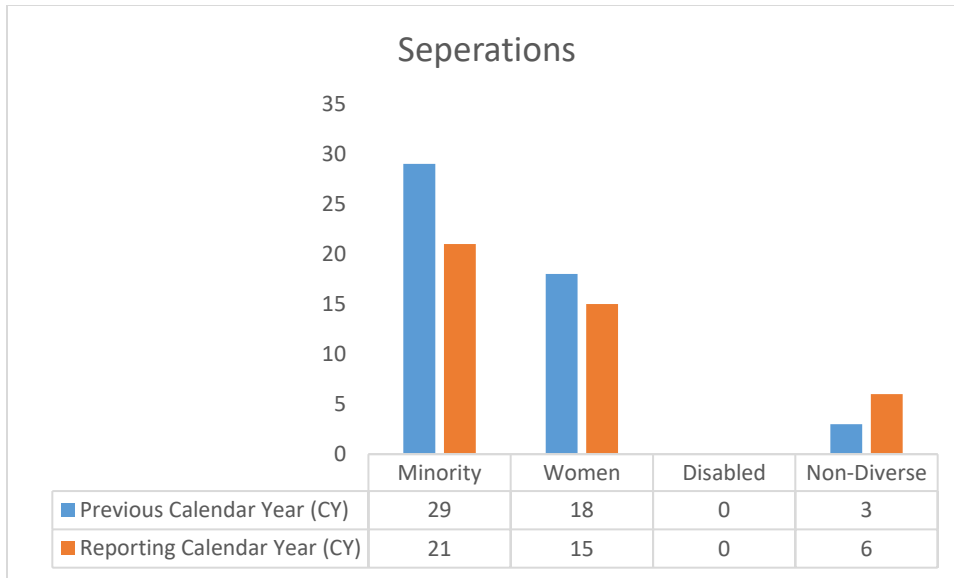
Note 3: Minority includes American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Two or More Races, Native Hawaiian or Pacific Islander and White Women.

Note 4: Raw data is available in the Appendix section.

Note 5: The chart includes new hires who self-identified both race and gender.

Separations – §1223.23(b)(5) and §1223.23(b)(11)

- ✚ In 2018, there were 32 employees who left the Bank’s employment. Of those employees who left the Bank, 18 were women and 29 were diverse.
- ✚ In 2019, there were 27 employees who left the Bank’s employment. Of those employees who left the Bank, 15 were women and 21 were diverse.
 - ✓ Observation: The Bank has successfully retained more women and diverse employees in 2019 than in 2018.



Note 1: Non-Diverse refers to individuals that are not minorities, women, or disabled.

Note 2: Double counting may occur for individuals that are classified under more than one category of minority, women, or disabled.

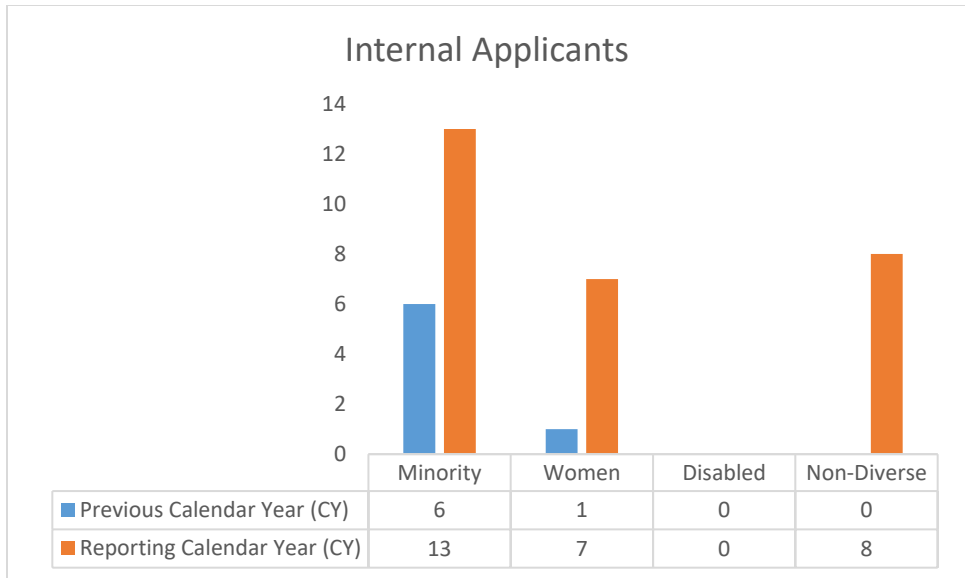
Note 3: Minority includes American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Two or More Races, Native Hawaiian or Pacific Islander and White Women.

Note 4: Raw data is available in the Appendix section.

Internal Applicants – §1223.23(b)(7)(i and ii) and §1223.23(b)(11)

Internal applicants only include active Bank employees who formally applied to open positions (excludes promotions).

- ✚ In 2018, there were a total of 6 internal applicants. 1 was a woman and 6 were diverse.
- ✚ In 2019, there were a total of 21 internal applicants. 7 were women and 13 were diverse.
 - ✓ Observation: In 2019 the total number of women and diverse internal applicants increased between 2018 and 2019.



Note 1: Non-Diverse refers to individuals that are not minorities, women, or disabled.

Note 2: Double counting may occur for individuals that are classified under more than one category of minority, women, or disabled.

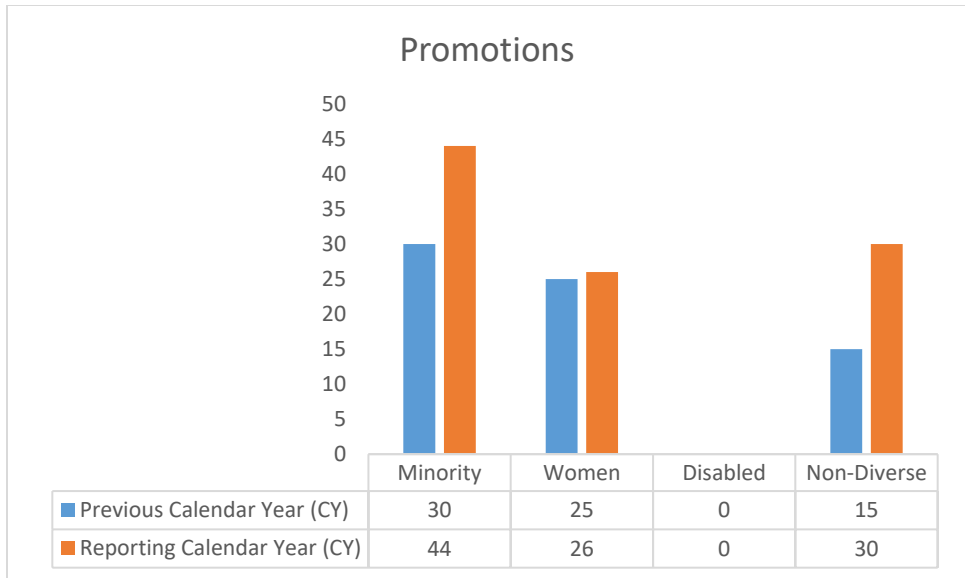
Note 3: Minority includes American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Two or More Races, Native Hawaiian or Pacific Islander and White Women.

Note 4: Raw data is available in the Appendix section.

Note 5: The chart includes only applicants who self-identified both race and gender.

Promotions – §1223.23(b)(8)(i - iii) and §1223.23(b)(11)

- ✚ In 2018, there were 45 employees who were promoted. Of those promoted, 25 were women and 30 were diverse.
- ✚ In 2019, there were 74 employees who were promoted. Of those promoted, 26 were women and 44 were diverse.
 - ✓ Observation: Promotions for women and diverse employees increased between 2018 and 2019.



Note 1: Non-Diverse refers to individuals that are not minorities, women, or disabled.

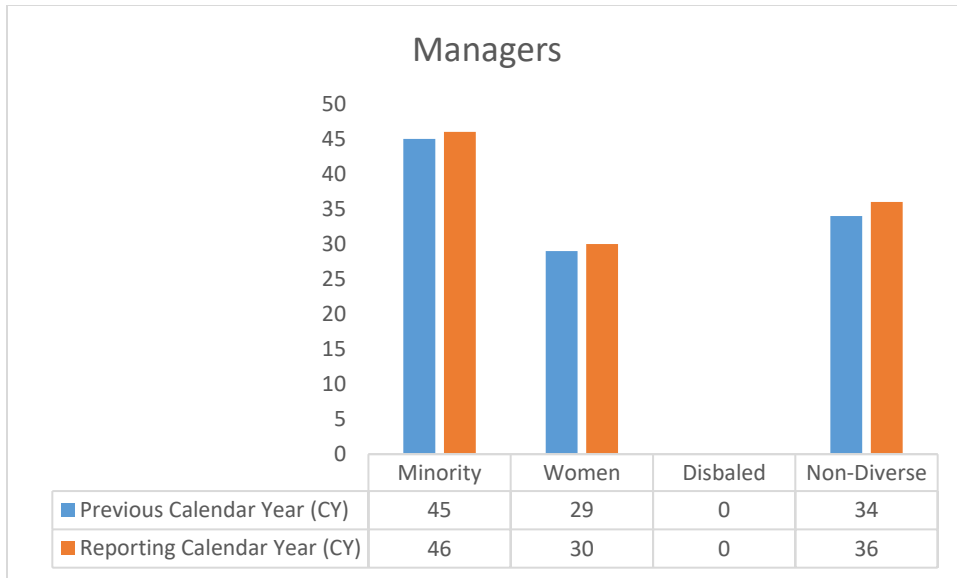
Note 2: Double counting may occur for individuals that are classified under more than one category of minority, women, or disabled.

Note 3: Minority includes American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Two or More Races, Native Hawaiian or Pacific Islander and White Women.

Note 4: Raw data is available in the Appendix section.

Supervisors and/or Managers – §1223.23(b)(9) and §1223.23(b)(11)

- ✚ In 2018, the Bank had 79 employees who were managers. The distribution of managers was 29 women and 45 diverse.
- ✚ In 2019, the Bank had 82 employees who were managers. The distribution of managers was 30 women and 46 diverse.
 - ✓ Observation: The number of women and minority managers increased between 2018 and 2019.



Note 1: Non-Diverse refers to individuals that are not minorities, women, or disabled.

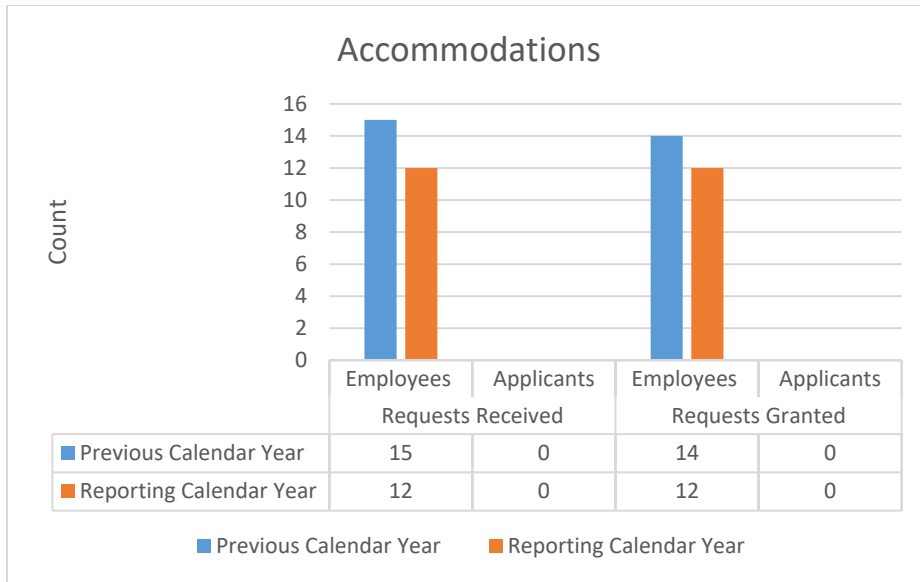
Note 2: Double counting may occur for individuals that are classified under more than one category of minority, women, or disabled.

Note 3: Minority includes American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Two or More Races, Native Hawaiian or Pacific Islander and White Women.

Note 4: Raw data is available in the Appendix section.

Accommodations – §1223.23(b)(6) and §1223.23(b)(11)

- ✚ In 2018, there were 15 employees who requested an accommodation. Of the 15 requests, 14 requests were granted. 13 of the 15 requests, were medical accommodations and 2 were workplace accommodations. One employee was classified as disabled.
- ✚ In 2019, 12 employees requested an accommodation all of which were granted. 8 of the 12 requests were medical accommodations, 3 were workplace accommodations and 1 was a religious accommodation.
- ✚ There were no applicants who requested an accommodation in 2018, or 2019.
 - ✓ Observation: While the number to total accommodation requests decreased from 2018 to 2019, all accommodations were granted in 2019 as compared to 2018.



<i>Year</i>	<i>Requester</i>	<i>Requests Received</i>	<i>Requests Granted</i>	<i>Disabilities Accommodated</i>	<i>Type of Accommodation Granted</i>
<i>Reporting Year</i>	Employee	8	8	0	Work from home
	Employee	2	2	0	Ergonomic workstation set up
	Employee	1	1	0	Wearing sneakers
	Employee	1	1	0	Religious
	Applicant	0	0	0	NA
<i>Previous Year</i>	Employee	11	11	0	Work from home
	Employee	1	1	0	Work from NJ office
	Employee	1	1	0	Ergonomic Work Station set-up
	Employee	1	1	0	Wearing sneakers and using Pillow
	Employee	1	0	0	Temporary Parking Space at NJ Office
	Applicant	0	0	0	NA

Outreach - §1223.23(b)(13) and §1223.23(b)(23)

The Bank’s Diversity and Inclusion Specialist (“D&I Specialist”) builds relationships with selected colleges and universities, local and national professional associations, and other diversity organizations to help develop a talent pool and increase the number of minorities, women, and individuals with disabilities (“Diverse Candidates”) applying and being hired for open positions at the Bank. Through these relationships, the D&I Specialist strives to meet the Bank’s objective of creating a brand as an employer of choice by highlighting our various opportunities, culture, benefits, and commitment to diversity and inclusion.

In 2019, the Bank established a relationship with the Computer Science Co-Op Program at the City College of New York. The Bank hosted two interns through the course of six months and hired one diverse student to the Software Quality Engineering Team.

Since 2016, the Bank has hosted a different intern through the [REDACTED] a New York Based workforce development program targeted towards diverse and women demographics in urban communities with the goal of providing participants with enhanced business skills that can be utilized in the workforce. In 2019, the Bank hired its first YAIP participant to a full time role in the Accounts Payable department.

Outreach was conducted to several strategic diversity partner organizations and universities with diverse student bodies in 2019. The intent was to establish and build relationships between the Bank and a strong pipeline of diverse candidates to fill current and future open positions.

In September 2019, the Bank hosted *“Building a Diversified Network with the FHLBNY.”* This event was the first by the Bank. Attendees learned about the future needs in finance, risk and technology from a panel of executives that discussed the skills needed to keep applicants relevant as they navigate their careers. Attendees listened and learned from a certified international executive coach regarding personal branding; observed a panel featuring FHLBNY C-suite Executives and Board Members; and met and networked with peers from various industries and executives from the FHLBNY. This event helped advance the Bank’s objective of creating a brand as an employer of choice. We will continue to host these type of recruiting events in the future.

The following is a summary of the Bank’s D&I Outreach efforts in 2019:

Outreach Activity	Partnering Organizations/Government Offices
<p>Members of the Human Resources team attended the Diverse Science, Technology, Engineering and Mathematics (“STEM”) Career Fair. The fair resulted in two diverse Technology co-op hires. January 4, 2019</p>	<p>[REDACTED]</p>
<p>Members of the Bank attended the Spring Career, Co-op, Internship and Summer Job Fair. February 13, 2019</p>	<p>[REDACTED]</p>
<p>Members of the Bank attended [REDACTED] 2019 Alumni Career Fair. Pipeline building for diverse, seasoned professionals in NYC. April 10, 2019</p>	<p>[REDACTED]</p>
<p>Members of the Bank attended the [REDACTED] Branded the Bank as an Employer of Choice for applicants with disabilities. April 12, 2019</p>	<p>[REDACTED]</p>

Outreach Activity	Partnering Organizations/Government Offices
<p>Members of the Bank's Technology team attended the [REDACTED] [REDACTED] [REDACTED] August 1-3, 2019</p>	<p>[REDACTED]</p>
<p>Members of the Information Technology and Risk Teams attended the [REDACTED] [REDACTED]. Fair focused on diverse candidates in STEM fields. September 6, 2019</p>	<p>[REDACTED]</p>
<p>Diversity and Inclusion Networking Night at [REDACTED]. Event designed to host a lively discussion and networking focused around Diversity & Inclusion in the workplace with members of [REDACTED] diverse student professional organizations: [REDACTED] [REDACTED] [REDACTED] [REDACTED] November 14, 2019</p>	<p>[REDACTED]</p>
<p>FHLBNY recruited and placed an intern from the [REDACTED] Computer Science Co-Op Program. The intern was then hired full time at the Bank.</p>	<p>[REDACTED]</p>
<p>Human Resources on-boarded four women and diverse staffing vendors.</p>	<p>Various staffing agencies including [REDACTED] [REDACTED] [REDACTED]</p>

From 2018 to 2019, the FHLBNY decided to focus more on outreach events that targeted key hiring areas instead of overarching diversity events. The areas included an emphasis on talent in information technology and risk management. Additionally, the Bank has enhanced its relationship with two universities – [REDACTED] – through participating in already established university events to continue to build the Bank's brand. These universities are predominantly diverse in their student populations.

Outcome Analysis - §1223.23(b)(24)

Objective: To increase the average number of Black or African American, Hispanic or Latino and Disabled applicants and new hires over a three-year period.

Success: Between 2018 and 2019 the Bank has had an increase in the number of women and minority employees. This is due to an increase of women and minority new hires and successfully retaining them over the same time period.

Challenge: Between 2018 and 2019, there was a decrease in the number of women and diverse applicants. While the number of diverse and women employee separations decreased during this time period, these numbers are still higher than their non-diverse peers. A review of exit interviews during this period indicates that the top four reasons for turnover was 1) Better Opportunity; 2) Poor Performance; 3) Relocation; and 4) Retirement.

Progress Made: The Bank will continue to review its current programs to help ensure that the upward trend in diverse new hires and external applicants is sustained, while identifying new ways to enhance the number of external applicants who are Black or African American, Hispanic or Latino and Disabled. This will help us meet or exceed our Targets for applicants and new hires.

Objective: Help enhance inclusion at the Bank.

Success: In 2019, the Office of Diversity & Inclusion sent a survey to all employees to ask for their definition of *Workplace Inclusion*. Several themes were gleaned from the responses:

- ✚ Access and Opportunities
- ✚ Communication and Networking
- ✚ Sense of Belonging and Fair Treatment
- ✚ Culture and Recognition

A Committee was established with the goal of identifying proposed objectives aligned with these themes to help enhance inclusion at the Bank. The Committee members volunteered their time and are made up of employees from various departments, ranks, tenure, genders, races and office locations.

Challenge: Creating an inclusive culture is not a project and has no end date. The Bank will constantly reassess our goals, refining what we do, and how we do it.

Progress Made: The Committee developed a Mission and Vision Statement to help ensure focus on its objective. The Mission and Vision Statement is as follows:

Mission Statement:

“The mission of the Workplace Inclusion Committee is to foster a work environment where everyone feels respected, included and valued.”

Vision Statement:

To establish and articulate the principles of diversity and inclusion within the FHLBNY’s culture to:

- ✚ Foster a work environment where everyone feels respected, included and valued for who they are;
- ✚ Enable everyone to be heard; and

- ✦ Advocate for fair, transparent and unbiased treatment so that everyone’s contributions are equitably acknowledged on their individual merits alone.

The Committee also created proposed objectives that were presented to the Bank’s Management Committee. Various groups (Workplace Inclusion Committee, the Culture Management Office and Human Resources) are reviewing these proposals and considering how and when to implement.

Training & Development

The Bank is fervent in its efforts to provide all employees with opportunities for growth and development. An array of programs are offered by the Bank to foster employee development. Human Resources actively reviews submission of employee names by senior leaders and helps ensure diverse employees are considered to participate. Such programs include:

- ✦ Management Leadership Program is an 18-month program dedicated to strengthening leadership skills of employees.
 - ✓ In 2019, of those employees who participated, 45% were diverse and 55% were women.
- ✦ Stonier Education is a 3-year program dedicated to enhancing banking and financial knowledge in the business sector.
 - ✓ In 2019, one Black or African American man participated in the program.
- ✦ Toastmasters International offer employees a one-of-a-kind course to master the art of public speaking. In 2019, Toastmasters was comprised of 54% women and 76% diverse employees. Employees join Toastmasters to:
 - ✓ Conduct effective meetings
 - ✓ Develop/improve public speaking and communication skills
 - ✓ Organize productive teams
 - ✓ Offer constructive criticism
 - ✓ Present ideas more effectively
 - ✓ Develop their leadership potential
- ✦ Developing U is a training and development program offered by our employees for our employees. This peer-led education and development program is designed to encourage a better-rounded banking career while also ensuring that FHLBNY employees gain institutional knowledge.
 - ✓ In 2019, 75% of Developing U presenters were diverse.
- ✦ Learn & Engage is executed by Senior Leadership (“Group Heads”) at the Bank. Learn & Engage sessions provide employees with a broad overview of the specific business lines within the Bank. The Bank’s Director of Diversity & Inclusion presents in this forum as well and discusses the Bank’s D&I Program. While the Learn & Engage sessions are scheduled to accommodate new hires, current employees are welcomed and encouraged to attend.

Succession planning meetings are held annually with Group Heads to determine employee readiness for senior leadership positions. Human Resources partners with Group Heads to help ensure diverse employees are considered in each discussion and development gaps are identified along with associated training.

Future Strategy - §1223.23(b)(25)

The Bank completed efforts for the first year of its three year strategic plan. Certain Checkpoints and Targets were met or exceeded and the Bank will continue to review its current employment programs to help ensure an increase in the number of diverse applicants and new hires to help us meet and exceed our Targets. The enhancement of the Bank's outreach in 2019 to strategic diverse partner organizations (diversity-focused organizations that have members in specific industries), schools with highly-diverse student populations, and government-sponsored programs in place to increase diversity in the private sector, are just some of the ways that the Bank will continue to strive to become an employer of choice for diverse talent looking for a stable, growth-potential career.

The Bank will also continue to evaluate its career pathing process to determine where enhancements can be made and will also review its employment program to help identify factors that are contributing to the increasing trend of women and diverse employee turnover.

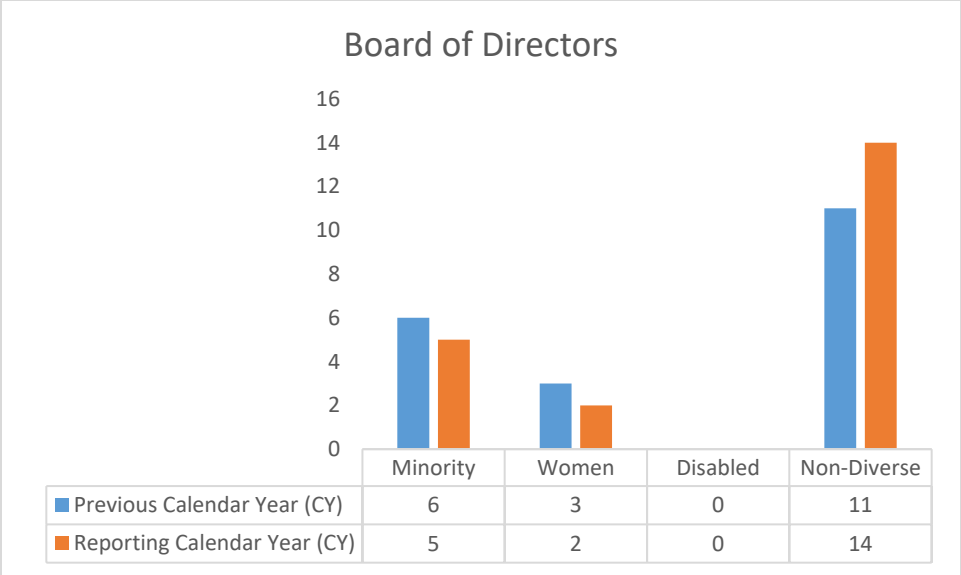
Board of Directors

The FHLBNY's Board recognizes that diversity at the Board level strengthens the Bank's ability to respond to member needs and adjust as needed to a rapidly changing environment. As with other aspects of the FHLBNY's operations, defining, maintaining, and increasing diversity directly impacts individuals and requires careful thought and implementation. The FHLBNY's Board is also aware that the FHFA's Minority and Women Inclusion regulation requires each FHLB to (1) annually request each member of the FHLB's Boards provide, on a voluntary basis, self-identification of his or her Equal Employment Opportunity status information as well as (2) describe outreach activities and strategies related to promoting diversity in nominating or soliciting nominees for positions on the Board.

Board Diversity – §1223.23(b)(10)(i)

Data pertaining to the composition of the Board for each year-end reporting period was collected through questionnaires distributed in December of each year, which did not contain any requests for self-identification.

- ✚ In 2018, there were 17 Directors (with two vacancies) serving on the FHLBNY's Board. Eleven of these Directors identified as White men; two identified as White women; one identified as a Black or African American man; two identified as Hispanic or Latino men; and one identified as a Hispanic or Latino woman.
- ✚ In 2019, there were 19 Directors serving on the FHLBNY's Board. 14 of these Directors identified as White men; one Director identified as a White woman; two Directors identified as a Black or African American men; one Director identified as a Hispanic or Latino man; and one Director identified as a Hispanic or Latino woman. This information is summarized in the below table.
 - ✓ Observation: Between 2018 and 2019 the number of women and minority Board members decreased.



Outreach Activities and Strategies - §1223.23(b)(10)(ii)

The FHLBNY encourages its members to consider diversity in nominating and electing qualified individuals to member and independent directorship positions. For example, in its 2019 Director Election Announcement Package sent to eligible members, this message appeared:

“The Critical Importance of a Diverse Board / The FHLBNY’s Board of Directors consists of a talented group of dedicated individuals that benefits from, among other things, demographic (including gender and racial) diversity, and we expect that this will continue in the future. As you consider potential nominations for Member Directorships and give thought to persons who might be interested in Independent Directorships, please keep diversity in mind. Your participation in this year’s Director Election process is greatly appreciated, and will help continue to keep the Board and the FHLBNY diverse – and strong.”

The FHLBNY’s Board will continue to keep diversity as one of the key factors used to help determine who will best serve the current and the future interests of the FHLBNY and the FHLBNY’s stakeholders through service as a Director. To further this, the Bank has subscribed to the service [REDACTED] a website designed to match boards looking for directors and persons looking to serve as directors.

One unexpected challenge that was discovered during testing of the service was that, despite the Bank’s efforts of the FHLBNY to write a carefully worded description, a number of potential candidates did not necessarily read the Bank’s posting carefully and submitted intentions of interest even though they were out of district or otherwise did not qualify on their face. This will require more work on the part of the Bank to resolve.

Outcome Analysis - §1223.23(b)(24)

With respect to the 2019 Independent Director Election process, the FHLBNY received for consideration before the application deadline three applications to fill two open positions. Two of the applications were from persons observed to be women (including one incumbent Independent Director observed to be Hispanic); the third application was from an incumbent Independent Public Interest Director observed to

be Black or African-American. Based on the Corporate Governance and External Affairs Committee's recommendation, after interviews with the candidates and consultation with the Board's Affordable Housing Advisory Council, the Board nominated the incumbent male candidate and the incumbent female candidate to be the two nominees for placement on the ballot for the two Independent Directorships to be filled for terms beginning on January 1, 2020. Both nominees were elected by the FHLBNY's membership.

Future Strategy - §1223.23(b)(25)

A process improvement will be to continue the Bank's efforts to reach out to FHLBNY members -- the constituents who nominate persons in connection with, and vote in, the Member Director elections -- prior to the start of the election season reminding them of the importance of diversity. However, the FHLBNY recognizes that the executive suites of its members may not be diverse in their composition and that it is traditionally a member president or director who serves on a FHLB Board.

In this year's election, with five Director seats open, the FHLBNY has identified two seats -- an Independent Director seat and a New Jersey Member Director seat -- as to which the incumbents have reached their term limits cannot run again. This will provide the FHLBNY with an opportunity to help enhance diversity on the Board. Additionally, the Bank will work more closely with executive search firms in order to pipeline candidates for these open seats.

Supplier Diversity

The Bank is committed to establishing strong relationships with our business partners and actively promoting opportunities for certified MWDOBs. We see diversity as a competitive strength that helps us leverage our differences to be the best. Partnering with MWDOBs helps us to grow our pool of suppliers, provide opportunities to diverse businesses, and to fulfill our customers' needs and expectations.

In 2019, the Bank continued its efforts to enhance opportunities to MWDOBs and partnered with existing vendors and internal stakeholders to help raise awareness about the Bank's commitment and efforts to diversity and inclusion, and to execute on the Board approved Procurement Program.

The FHLBNY Procurement Program promotes MWDOB inclusion by:

- ✚ Providing governance and framework for the Procurement Program;
- ✚ Identifying and educating potential MWDOBs to increase our pool of vendors to select from;
- ✚ Promoting an internal culture and education that embraces collaboration with MWDOBs and helps ensure a level playing field to all potential bidders;
- ✚ Identifying opportunities for MWDOBs to compete for FHLBNY business on an equal basis;
- ✚ Partnering with organizations to help increase knowledge of diversity and inclusion practices, outreach pathways, and opportunities; and
- ✚ Publishing the general products and services the Bank procures on the diversity and inclusion webpage.

As part of the Bank’s Strategic Plan, the Procurement team updated Checkpoints and Targets to help us align with current and future market conditions and to help us meet our Procurement Targets. The Targets and Checkpoints along with the full year 2019 results are listed below. In 2019, the Procurement Checkpoints and Aspirational Targets were met and exceeded.

Aspirational Targets						
Category	Average 2016-2018	2019 Checkpoint	2020 Checkpoint	2021 Checkpoint	Aspirational Targets	2019 Q4 Results
Total Number of Contracts	26%	10%	20%	26%	26%	34%
Minority-owned Business	12%	7%	12%	12%	12%	18%
Women-owned Business	13%	3%	7%	13%	13%	13%
Disabled-owned Business	<1%	<1%	<1%	1%	1%	3%
MWDOB Spend	17%	9%	13%	17%	17%	31%
Minority-owned Business	13.01%	5%	8%	11%	11%	24%
Women-owned Business	3.46%	3%	4%	5%	5%	6%
Disabled-owned Business	<1%	<1%	<1%	1%	1%	0.01%

Number of Contracts

With the implementation of the Bank's Vendor Management Program (“VM Program”) and automated system in 2016, the Bank enhanced its pre-procurement processes. As a result, contracts with vendors are classified as relationships. Therefore, reporting on contracts with MWDOBs is based on relationships that were reviewed and approved as part of the VM Program.

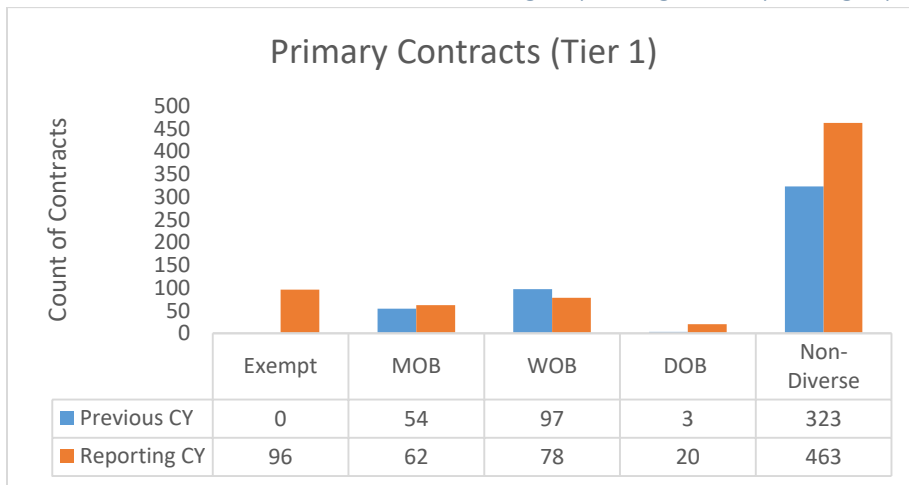
- ✚ In 2018, the Bank entered into 477 relationships. Of those relationships, 254 were awarded to MWDOBs for the purchase of goods and services.
- ✚ In 2019, the Bank entered into 623 relationships with all vendors. Of those relationships, 463 were awarded to non-diverse vendors, and 160 were awarded to MWDOBs for the purchase of goods and services.
 - ✓ Observation: There has been a decrease in the number of contracts the Bank has entered into with MWDOBs.

The Bank currently maintains a Board-approved “*Exclusion*” listing and a Management Committee-approved “*Exception*” listing. As required by the MWI Regulation, the listings were submitted to the FHFA in November 2019, and is attached as Appendix No. 3.

Total Number of Contracts – §1223.23(b)(14)

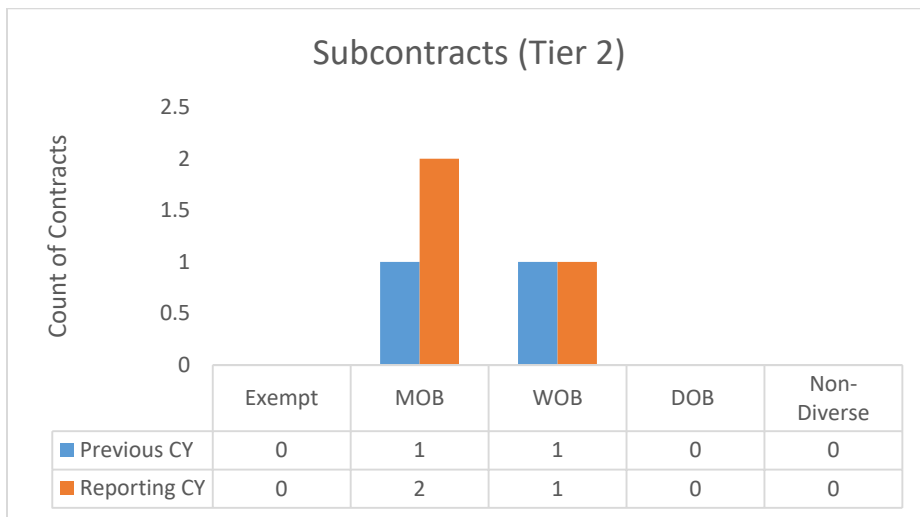
Year	Total Number of Contracts in Place at Beginning of Reporting Year	Total Number of Contracts Entered into During Reporting Year
2019	497	623

Number of Contracts Entered Into During Reporting Year by Category – §1223.23(b)(16)



Note 1: Exempt includes transactions where contracts are not required, for example with employees, directors, interbank transfers and charitable donations.

The Bank has in place contracts such as Member Agreements, Swap Agreements, Repo Agreements, Letters of Credit, Advances, Loans, Charitable Donations and contracts related to Federally Required Sources which are excluded from spend reporting. These exclusions are not included in the number of contracts stated above.



The Bank currently does not have an automated process or systems in place to capture the number of contracts that a prime contractor enters into with a MWDOB subcontractor (Tier 2). The Bank currently can manually obtain Tier 2 contract and spend for construction costs for the build out of the expansion space in the New York office and the New Jersey office only.

The Bank has amended its contract template to include a statement in the terms and conditions section that vendors are required to disclose this information upon request for future contracts and spend. In 2020, the Bank will explore other options that would help secure Tier 2 data for reporting purposes.

Amount Paid for Contracts

The Bank is currently working on a process to capture the amount paid for contracts. This process is expected to be completed by June 2020 and data reconsolidation will be complete before the end of 2020. The process will allow the Bank to report contract data as of January 1, 2019 and onward.

The Bank currently reports on relationships entered into with vendors and total spend.

Total Amount Paid – §1223.23(b)(15)

The Bank is currently working on a process to capture the amount paid for contracts. This process is expected to be completed by June 2020 and data reconsolidation will be complete before the end of 2020. The process will allow the Bank to report contract data as of January 1, 2019 and onward.

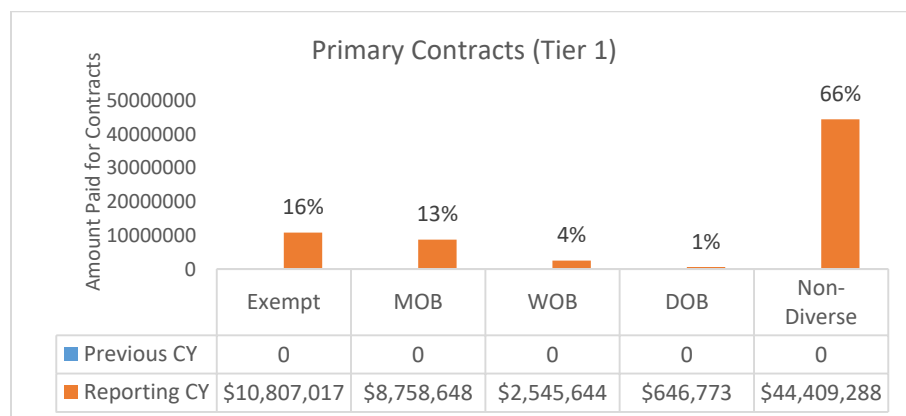
Year	Total Amount Paid for Contracts in Place at Beginning of Reporting Year	Total Amount Paid for Contracts Entered into During Reporting Year
2019	*	** \$67,167,370

*The Bank does not currently have the capability to capture the Total Amount Paid for contracts at the beginning of 2019.

** This amount represents partial reconciled data for the amount paid for contracts during 2019. Ongoing effort to reconcile the data are being done by the Bank's Vendor Management Office.

Amount Paid for Contracts Entered Into During the Reporting Year by Category – §1223.23(b)(17)

The Bank is currently working on a process to capture the amount paid for contracts entered into during the reporting year by category. This process is expected to be completed in 2020. The process will allow the Bank to report contract data from January 1, 2019 and onward.

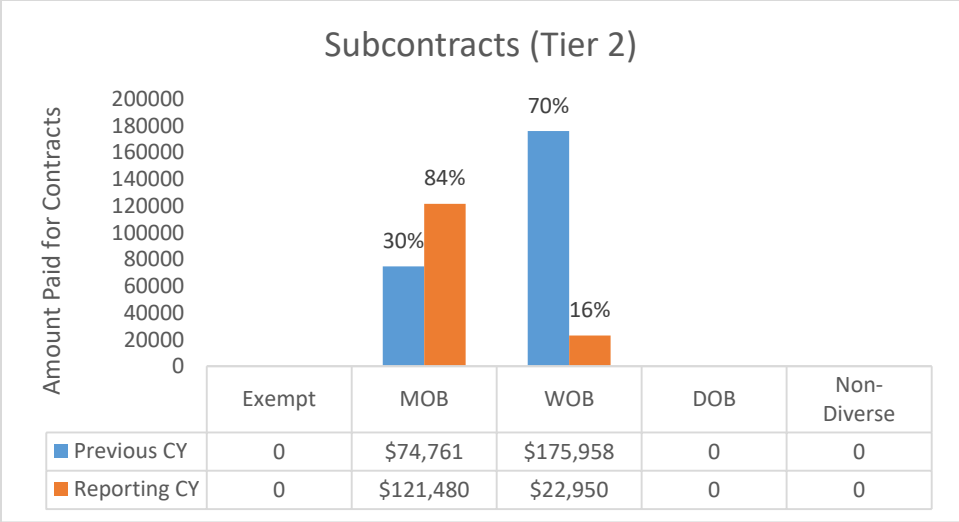


Note 1: Non-Diverse refers to businesses that are not minority-, women-, or disabled-owned.

Note 2: Double counting should not occur for businesses that fall under more than one category of minority-, women-, or disabled-owned.

Note 3: This amount represents partial data for the amount paid for contracts during 2019. Ongoing effort to reconcile the data are being done by the Bank's Vendor Management Office.

Note 4: Exempt spend includes amount paid to employees, directors, interbank transfers, charitable donations, where contracts are not required.



Note 1: The Tier 2 contracts are related to New York and New Jersey offices construction project only.

Note 2: This spend is captured in the Q4 QDR as a manual process. The Bank is working on a formal process to capture and report the data.

Annual Spend

- ✚ In 2018, the Bank’s total annual vendor spend (without Exempt spend) was approximately \$63.42 million. The total spend with MWDOBs was \$26.82 million.
- ✚ In 2019, the Bank’s total annual spend including Exempt spend was approximately \$80.93 million. The total spend with MWDOBs was \$22.11 million.
 - ✓ Observation: The MWDOB spend for 2018 was higher than 2019. The Bank promotes Tier 2 contracting in its standard terms and conditions with vendors, and is currently able to track Tier 2 spend only related to the construction costs for the build out of the New Jersey office and expansion space in the New York office.

Diverse Spend with Non-Diverse-Owned Businesses – §1223.23(b)(18)

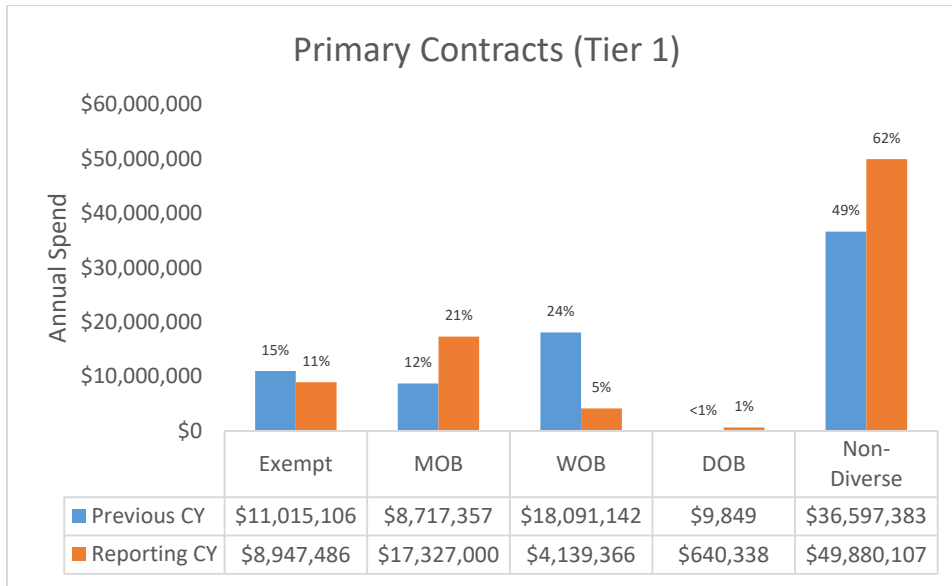
In 2019, the Bank was only able to obtain spend data with non-diverse owned legal firms. The Bank’s General Counsel provided this information and is working on implementing a process in 2020 to capture diverse spend with more of the Bank’s non-diverse owned businesses.

The Bank has recorded \$11,640 of diverse spend with non-diverse owned law firms in 2019.

Year	Spend
2019	\$11,640

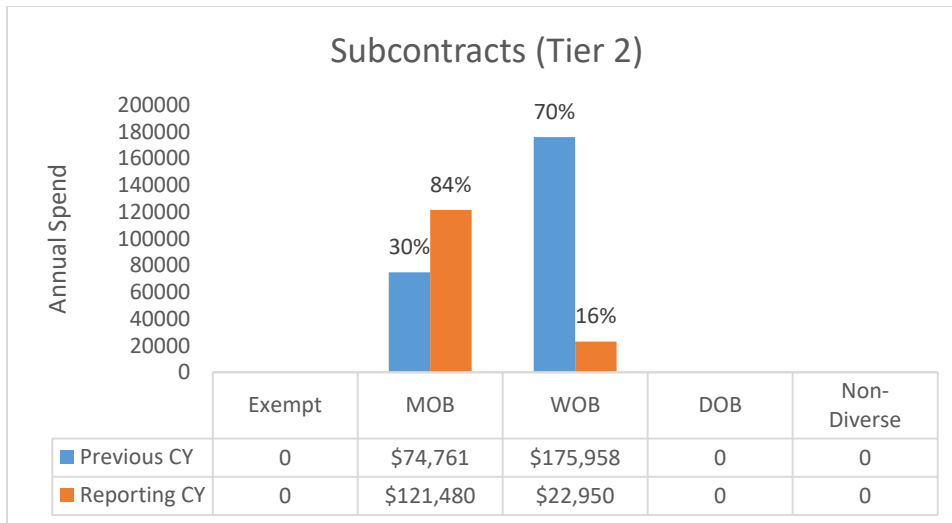
Note: This spend was manually entered in Q4 QDR. The Bank is working on a process to capture and report the data.

Annual Spend by Category – §1223.23(b)(19)



Note 1: Percentages for charts on this page represent proportions of total spend without double counting.

Note 2: Exempt includes transactions where contracts are not required, for example with employees, directors, interbank transfers and charitable donations.



Note: The Tier 2 spend information captured above is only related to 2018 and 2019 construction spend.

Outreach - §1223.23(b)(13) and §1223.23(b)(23)

In 2019, the Bank continued to execute on its Procurement Program to help solicit or advertise for MWDOBs to submit proposals to provide goods and/or services. Specifically, the Bank engaged in activities that included internal education and outreach, vendor outreach, networking events, and partnerships with local and regional organizations as well as provide contracting opportunities to MWDOBs.

Internal Education and Outreach

The Bank continued its education and outreach efforts to (1) educate Contract Owners on the Bank's procurement and competitive bid process, and inclusion efforts to increase awareness of MWDOBs, and, (2) arrange meet and greet sessions between MWDOBs and Contract Owners to help establish relationships.

Education and internal outreach efforts included:

- ✚ Working with the Bank's Technology Services Group to identify products and services for procurement engagements and to educate them on the Bank's bid practices.
- ✚ Introduction of vendors and resellers to the Bank for:
 - ✓ IBM software support;
 - ✓ Oracle software support;
 - ✓ Value Added Resellers for technology maintenance (diverse vendor with experience and strategic partnerships with Original Equipment Manufacturer);
 - ✓ Consulting Services related to the Bank's Technology Strategy and Quality Assurance Testing (four diverse vendors recommended);
 - ✓ Construction related opportunities for the Bank's Washington, DC Office (diverse vendor bid opportunities); and
 - ✓ Construction related opportunities for the New York office.

Vendor Outreach and Networking Events

Vendor outreach consisted of bidding opportunities, attending expositions and networking events, partnering with diverse councils and organizations, and updating and maintaining the Bank's website and vendor portal.

Bidding Opportunities

As a result of the bid process, the Bank processed 623 relationships for purchase of goods and services and awarded 160, which included no bid opportunities and relationships under \$10,000 to MWDOBs.

Networking and Partnerships

The Bank continued to build on its effort to support and promote MWDOB activities and its brand among the diverse vendor community. The Bank's Buyer served as a Board member for the [REDACTED], and served as the chairperson for the Supplier Diversity Committee as well as the First Vice-President. As part of 2019 activities, the Bank attended and hosted quarterly meetings with the [REDACTED] Board to discuss various procurement topics, and, in April, partnered with the [REDACTED] to host and participate in a supplier diversity exposition.

Bank representatives also attend the monthly supplier diversity meetings and periodically hosts these meetings on the Bank's premises which are geared towards promoting opportunities for diverse vendors. In addition, Bank representatives attend the [REDACTED] monthly networking breakfast sessions that focus on networking with other procurement professionals and MWDOBs.

Bank representatives regularly attend the [REDACTED] quarterly roundtable meeting, sharing procurement best practices among corporate members with the focus on improving procurement practices and advance supplier diversity initiatives.

Other events attended include:

- ✚ In May, Bank representatives attended the 2019 [REDACTED] and met with diverse and non-diverse technology vendors to discuss potential procurement opportunities. In addition, attended educational sessions focused on best practices in technology procurement as well as the influence of supplier diversity in technology procurement.
- ✚ In June, Bank representatives attended the [REDACTED] and met with several women owned businesses to discuss procurement opportunities and to educate the businesses on the Bank procurement practices. The Bank also identified diverse vendors to participate in the Bank’s Washington, DC office construction project.
- ✚ In October, Bank representatives attended the [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] n. Bank representative conducted one on one sessions with targeted diverse vendors to discuss potential procurement opportunities with the Bank. The Bank was successful in identifying a diverse vendor to submit a proposal for the construction of the Washington, DC office. In addition, Bank representatives had initial conversations with a WOB/MOB for information technology professional services who subsequently became a registered vendor.
- ✚ In November, Bank representatives attended and sponsored the 2019 [REDACTED] [REDACTED]. The event is organized by the New York State Office of General Services, and the Bank provided information on its D&I Procurement Program to help identify disabled owned business for future opportunities. Additionally, the Bank advertised its D&I Program at the conference. The event was successful and the Bank on-boarded a Service Disabled Owned Veterans business who is a Value Added Reseller for software maintenance services. This vendor was awarded two opportunities through the bid process.

Outreach Activity	Partnering Organizations/Government Offices
[REDACTED]	[REDACTED]
Quarterly Board Meetings	[REDACTED]
Supplier Diversity Exposition	[REDACTED]
[REDACTED] exposition	[REDACTED]
[REDACTED] Opportunity Exchange exposition	[REDACTED]
Education Sessions with the [REDACTED]	[REDACTED]
[REDACTED] Conference	[REDACTED]
[REDACTED] Conference	[REDACTED]

From 2018 to 2019, the Bank continued to attend the monthly and quarterly meetings of the various supplier diversity councils/associations in New York. This allowed the Bank's Procurement team to further educate themselves on improving procurement practices and advance supplier diversity initiatives. Additionally this year, Bank representatives attended procurement conferences directed at minority, women, veteran and disabled owned businesses. Through these conferences, the Bank identified and provided bid opportunities to vendors for current projects and successfully on-boarded a Service Disabled-Owned Veterans business and a Woman-Owned business.

D&I Portal

The Bank updated content and reformatted its D&I Procurement webpage for ease of use. The Bank continues to welcome vendor solicitations on its diversity page on its website at <http://www.fhlbny.com/>, and diverse vendors will be directed to the Supplier Gateway portal for registration as an MWDOB vendor.

The Bank incorporated its commitment to MWDOBs in the standard company description and continues to publish its process for responding to supplier questions and/or complaints on the Bank's webpage. In addition, the general list of goods and services has been published on the Bank's website.

Outcome Analysis - §1223.23(b)(24)

Objective: Increase Procurement outreach through networking events.

Success: The Bank had success in outreach events and sourcing through networks such as ISMNY and NY/NJMSDC, as well as with existing vendors. The Bank also provided opportunities for diverse vendors to bid on contracting opportunities in:

- ✚ Real Estate (branding, commissioning, inspections, general contracting with Tier 2 spend)
- ✚ Information Technology Infrastructure (Multi-Factor, Software Maintenance, Business Intelligence initiatives)
- ✚ Data Warehousing opportunities

Challenges: The Bank experienced various challenges in 2019 including:

- ✚ Limited bid opportunities for business in 2019. Of the 623 relationships executed, only 160 obtained a bid opportunity from a MWDOB.
- ✚ There was minimal success connecting with MWDOBs at the exposition segment of the Interop conference, as there were only a few MWDOB exhibitors in attendance. The Bank will not attend this event in 2020.
- ✚ At the [REDACTED] and [REDACTED] conferences, corporations were primarily the exhibitors with MWDOBs visiting the various booths to pitch their products and services. Based on the format of the events, it would have been more beneficial in connecting with MWDOBs if the Bank had dedicated booths.

Progress Made: Bid process and vendor outreach activities resulted in awards to 160 relationships, which included no bid opportunities and relationships under \$10,000 to MWDOBs.

Future Strategy - §1223.23(b)(25)

The Bank strives to enhance and maintain a strong foundation of the business contracting and procurement activities that are consistent with regulatory requirements. The Bank's goal continues to be the full integration of vendor diversity into the Bank's business practices, and will continue to enhance systems and processes to enhance outreach, opportunities, and reporting.

The Procurement team continues to partner with management, service providers and other Federal Home Loan Banks to increase its knowledge of diversity practices, outreach, and overall spend activities with MWDOBs. In 2020 the Bank will continue in its efforts to identify opportunities at the local and regional levels for interactions with MWDOBs, specifically disabled owned businesses, and will enhance our internal systems to allow for increased reporting on spend and outreach activities.

Other initiatives that will be part of the Procurement Program are:

- ✚ Continue to enhance the scrutiny of "preferred vendor", "sole source" and "rush order" to help ensure that the Bank secures multiple bids from suppliers which include MWDOBs.
- ✚ Engage internal and external resources to identify a solution/system to increase reporting capabilities on spend and relationship spend for annual and quarterly regulatory reports.
- ✚ Continue to expand MWDOB outreach and education.
- ✚ Engage local and regional organization for partnerships to help enhance the current Procurement Program.
- ✚ Consider purchasing booths at the WBNEC and NMSDC events to increase outreach and networking opportunities with MWDOBs.

Financial Transactions

The FHLBNY's Capital Markets Group is committed to providing governance, outreach, education, and opportunities to Minority, Women, and Disabled Owned Broker/Dealers in the area of Capital Markets to include debt issuance, asset purchases and consulting. The Capital Markets objectives are to:

- ✚ Help to ensure standards and processes are published and available to all stakeholders ("Governance")
- ✚ Increase the pool of approved MWDO Broker/Dealers for asset transactions ("Outreach")
- ✚ Educate MWDOB Broker/Dealers on the various Bank investment and issuance strategies and the Bank's business needs ("Education")
- ✚ Provide for and attempt to increase opportunities for MWDO Broker/Dealers to compete for Bank business ("Opportunities")

As part of the Bank's Strategic Plan, the Capital Markets Group recently updated their Checkpoints and Targets to help align with current and future market conditions that will help us meet our Capital Markets Targets. The Targets and Checkpoints along with the full year 2019 results are listed below. In 2019, the Capital Markets team has met or exceeded their Checkpoints for Activity. For Liability and Asset Trades, the Bank did not meet their annual Checkpoint, but through continued targeted outreach programs, the Bank is focused on increasing these numbers in 2020.

Activity

Active Outreach, Education, Opportunity, and Access						
Activities	HAA	2019 Checkpoint	2020 Checkpoint	2021 Checkpoint	Aspirational Targets	2019 Results
Visits/Meetings with MWDOB broker/deals	9	10	11	12	11	12
Event Attendance (a percentage of events held)	2	50%	50%	50%	50%	50%
Credit Approval for asset purchases/sales as a percentage of available MWDOB broker/dealer counter parties	88%	80%	80%	80%	80%	68%
Maintain current percentage of daily outreach	100%	100%	100%	100%	100%	100%

Note: HAA is Historical Average Activity - Average Asset and Liability Trade Touchpoints and Activity with MWDO Broker/Dealers for the rolling period from 2016 through 2018.

Liability and Asset Trades

Debt Issuance						
Activities	HAA*	2019 Checkpoint	2020 Checkpoint	2021 Checkpoint	Aspirational Targets	2019 Results*
Percentage of DN Reverse Issuances	6%	8%	9%	10%	9%	5.2% (\$7 billion)
Percentage of Negotiated Bond Issuances	1%	2.5%	3%	3%	2.83%	2.8% (\$2.7 billion)
Asset Trades						
Activities	HAA*	2019 Checkpoint	2020 Checkpoint	2021 Checkpoint	Aspirational Targets	2019 Results
Percentage of MBS/HFA Deal Participation	57%	55%	55%	55%	55%	41%
Percentage of Total Non-MBS Purchases	29%	20%	20%	20%	20%	7.9% (\$1.125 billion)

Note: HAA is Historical Average Activity - Average Asset and Liability Trade Touchpoints and Activity with MWDO Broker/Dealers for the rolling period from 2016 through 2018.

* In subsequent years, these data will include the DN Window issuance and will be used in the calculations going forward. If the DN Window issuance was included, the figures would be 7.4% and \$24.1 billion.

Strategies, Initiatives, and Activities - §1223.23(b)(12)(ii)

In 2019, the Bank continued its enthusiastic commitment to governance, education, outreach and offering opportunities to the MWDO Broker/Dealers.

In terms of governance, the Capital Markets Group continued its meetings to stress the group's desire to consider how the MWDO Broker/Dealers might be involved in Bank transactions and created a procedure adhering to the Aspirational Practices created by the Federal Home Loan Bank System OMWI Council Capital Market Sub-group. Throughout the year, the Capital Markets Group is also reminded by management to consider working with a MWDO Broker/Dealer on almost every potential trade.

The Bank has been a pioneer in engaging MWDO Broker/Dealers since 2011 even though these firms have capital levels far below larger firms. The FHLBNY works with the Office of Finance ("OF") to understand the universe of MWDO Broker/Dealers in the marketplace, particularly those already approved to transact Consolidated Obligation issuance with the Federal Home Loan Bank System ("FHLB System"). Though the Bank would prefer the MWDO Broker/Dealers to be approved by the OF, it is not a prerequisite for an approval as the Bank does not have any specific internal procedures preventing the MWDO Broker/Dealer from being approved to perform transactions with the Bank. The Bank continues to seek additional firms for investments outside the OF approved list. The Bank met with [REDACTED] on a number of occasions and approved them as an investment counterparty in 2019.

Of the nineteen MWDO Broker/Dealers approved by the OF at the end of the year, the Bank has fourteen.

Liabilities

- ✚ In 2018, the Bank entered into 131 transactions of negotiated bond and discount note issuance with eleven MWDO Broker/Dealers. The total discretionary Consolidated Obligation issuance in 2018 increased to \$9.6 billion. The total discretionary Consolidated issuance, including the DN Window, was \$21.5 billion.
- ✚ In 2019, the Bank entered into 380 transactions of negotiated bond and discount note issuance with twenty-one (including a merged firm) MWDO Broker/Dealer dealers. The total discretionary Consolidated Obligation issuance, with the addition of the encouraged Discount Note Window trades, increased to \$24.1 billion. Without the addition of the DN Window, the discretionary Consolidated issuance was \$9.7 billion; an increase over 2018's \$9.6 billion.
 - ✓ Observation: There has been a consistent upward trend in the number of transactions with MWDO Broker/Dealers as well as the total amount of issuance since 2018.

Fees paid, on an overall basis, increased, despite the reduction in concession for DN executed in the DN Window, as the Bank increased its volume and the System paid fees to the MWDO Broker/Dealers on the syndicated issuance of Secured Overnight Financing Rate ("SOFR") floaters.

Assets

✚ In 2018, bond investments increased with fifteen trades among two MWDO Broker/Dealers for a total of \$1.45 billion of securities.

✚ In 2019, bond investments decreased with [REDACTED]

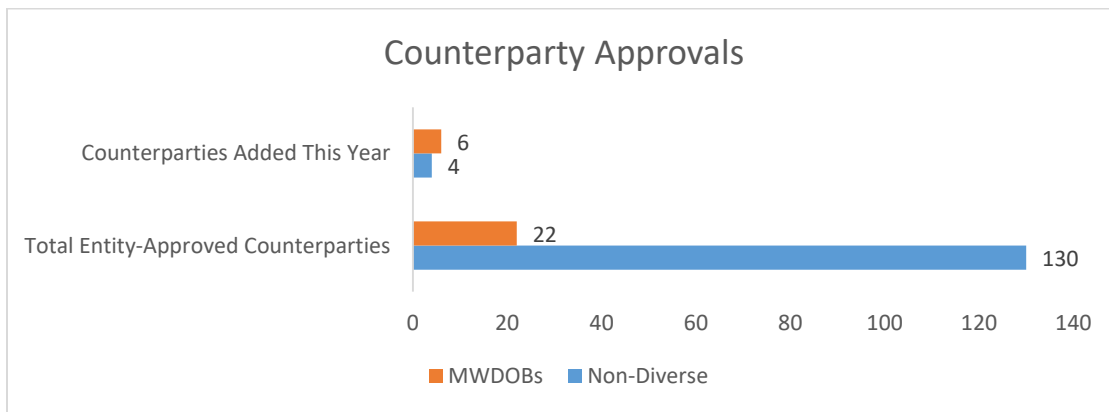
✓ Observation: There was a decrease in trades between 2018 and 2019.

Mortgage Backed Securities

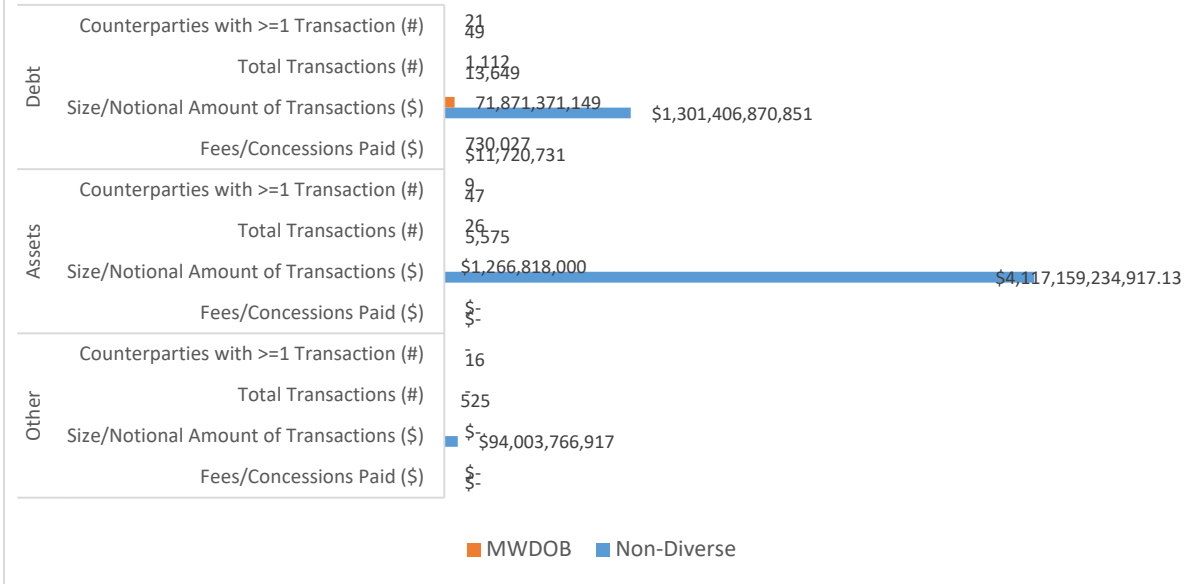
✚ In 2018, activity included sixteen trades with six MWDO Broker/Dealers for a total of \$132 million.

✚ In 2019, activity included sixteen trades with nine MWDO Broker/Dealers for a total of \$142 million.

✓ Observation: Mortgage Backed Securities investment activity, though greater than in 2018 in terms of notional and number of firms, was depressed as the Bank forwent purchasing bonds associated with LIBOR and thereby decreasing the number of available trade opportunities. The Bank witnessed an increase in the number of firms involved and in the notional of the trades.



Counterparty Utilization



Note: "Other" section consists of derivatives.

Outreach - §1223.23(b)(13) and §1223.23(b)(23)

The Bank continued to build on previous years' successful outreach through constant reinforcement of the commitment to allow access to MWDO Broker/Dealers into our daily Capital Markets' activities. The Bank maintained its practice of giving MWDO Broker/Dealers access to its day-to-day funding and investment needs, and sought ways to provide the MWDO Broker/Dealers additional information and tools to allow them to potentially grow their businesses through the Bank. The Bank reinforced contact with MWDO Broker/Dealers through phone calls, emails, Bloomberg messages, in-office visits and outings with several MWDO Broker/Dealers and lobbying outside firms to include MWDO Broker/Dealers in a number of deals. As co-chair of the Capital Markets Sub-group of the FHLB System OMWI Council, the Bank worked closely with the other Home Loan Banks to share information and ideas concerning the activity with the MWDO Broker/Dealers, particularly in the area of Debt Issuance programs.

The Bank continued to meet with these firms through presentations, charitable events, receptions, personal relationships, and through their market presence. The Bank also attended the Government Investment Officer's Association Conference and met with Loop Capital, held a credit approval call with Tribal Securities and attended lunches with the investors of Samuel Ramirez and CastleOak to explain the Bank's business and borrowing practices to aid the firms' in their investor marketing efforts. The Bank again organized and hosted the annual [REDACTED] held on October 2, 2019.

Outreach Activity	Partnering Organizations/Government Offices
Daily Bloomberg Messages concerning the Bank's Funding Needs	All 19 MWDO Broker/Dealers approved by the OF
Visits to MWDOB Broker/Dealer Firms	[REDACTED]
GIOA Conference: Meetings and Lunches with the Firms' Investors	[REDACTED]
MBS Discussions and Market Color by Phone, Visits to the Bank or Bloomberg/Emailed Commentary	[REDACTED]
Organized and Hosted the Diverse Dealer Reception	Eighteen of the Nineteen OF Approved Firms with only [REDACTED] was in attendance
Discussion concerning Consulting Engagements	[REDACTED]
Signing an agreement with a Liquidity Trading Portfolio Trading Platform	[REDACTED] (a woman-owned firm)

From 2018 to 2019, the Bank continued with similar successful outreach activities with the various MWDO Broker/Dealers. In 2019, the FHLBNY had some additional opportunities to go beyond the standard MWDO Broker/Dealer visits and meetings to work with the OF to meet with both the MWDO Broker/Dealers and their investors. The goal of such meetings is to explain the FHLB System and its various types and programs of debt issuance and answer any questions they may have concerning such activity. These marketing meetings are designed to help the MWDO Broker/Dealers sell investments to their clients.

Outcome Analysis - §1223.23(b)(24)

Objective: To continue to perform outreach, education and opportunities for the MWDO Broker/Dealers in terms of Financial Transactions.

Success: The Bank was successful in increasing the amount of Discount Notes and Bonds issued. This was achieved through daily communication and coordination with the MWDO Broker/Dealers and its investors to meet the Bank's specific funding need on or near a particular maturity date in the DN Window.

The Bank's desire to increase the purchase of US Treasuries for the Liquidity Trading Portfolio to meet the new FHFA Liquidity Advisory Bulletin illustrated the issue of the lack of capital held by the MWDO Broker/Dealers. The Bank was able to purchase the desired and specific bonds from inventory from numerous Non-MWDO Broker/Dealers firms. The larger MWDO Broker/Dealers were able to be a small part of the purchases but not in the quantity the Bank required.

Challenge: The challenges faced by the Bank include pursuing firms that are not engaging or participating in the Bank's desired product line, due to lower capital levels resulting in the inability to hold securities in inventory and the universe of available counterparties, though increasing, is small.

Progress Made: The Bank continues to work with all of the MWDO Broker/Dealer firms to continually look for ways to help the MWDO Broker/Dealers and the success is demonstrated in the positive feedback, whether on the phone or in person and public forums, to the Bank on its various efforts as they have and will continue to result in significantly positive impact on their businesses.

The Bank, via the FHLB System OMWI Council Capital Markets Sub-group, continues to find ways to integrate and expand the MWDO Broker/Dealers' role in all of the Debt Issuance Programs and looks for opportunities outside of the direct trades as the Bank brought in a women-owned Trading Platform to help with the management of its FHFA Liquidity Portfolio.

Objective: Increase the number MWDO Broker/Dealers with whom the Bank does business.

Success: The small number of overall MWDO Broker/Dealers allows the Bank to fully understand the business of each firm and act accordingly.

Challenge: The challenges faced by the Bank are the same as in the past and will most likely continue. Though a few more firms have been approved by the OF, the number of MWDO Broker/Dealers involved in the FHLB System's business lines is very small compared to the overall Broker/Dealer universe in terms of both number and capital.

██████████ was removed from the list as a result of bankruptcy during the year. Of the other firms, ██████████ was also removed by the OF for non-compliance of their rules and then reinstated when ██████████ came back into compliance. As a result of the initial removal, the Bank removed them as well, though will shortly bring them back as an active counterparty. ██████████ has been under review by the Bank's Credit Policy and Review group and should be approved in the very near future. ██████████ has gone through the credit process to be approved as the Bank's first MWDO Broker/Dealers Reverse Repo counterparty, but it currently has insufficient capital for these types of transactions. ██████ has stated it will undergo a capital injection soon and will then be approved. The Bank will also review the two firms approved by the OF at the end of 2019, ██████████. and ██████████ for investment purchase opportunities. In the fourth quarter, ██████████ and ██████████. merged to form ██████████. The final firm, ██████████, though visited by the Bank and receiving constant communications, has not expressed any interest in engaging with the Bank on the purchase or sale of assets.

Though the firms may wish to just engage in certain business lines, the main issue preventing them, even if they wish to do so, continues to be the amount of capital held by these firms. The lack of capital hinders the firms' ability to engage in a number of business lines compared with what the full-service firms are able to provide such as Derivatives, Asset Purchases, and Debt Issuance of larger amounts and in certain maturities and types. Even the merger between ██████████ did not significantly increase the firm's ability to provide services.

Progress Made: As the largest and most diverse Home Loan Bank System activity, debt issuance will always be the most beneficial to the MWDO Broker/Dealers as they have greater opportunities to participate in a number of debt issuance programs. The MWDO Broker/Dealers can establish an investor base and are able to pass-through the instruments directly to the investor without requiring the use of capital as it does not have the bond on its books. Also, the Home Loan Bank System can help direct, in certain programs, debt issuance to the firms.

The Bank will continue to work with the Home Loan Bank System and the firms to engage, educate, and attempt to create opportunities but the challenges will remain.

Future Strategy - §1223.23(b)(25)

The Bank's plans are to continue its successful program of integrating the MWDO Broker/Dealers in its planning and day-to-day activity. The Bank will continue to work to help grow the MWDO Broker/Dealers' business in the areas of Debt Issuance and Asset purchases by alerting the firms to any new Bank products or strategies and working with outside firms and, as the continuing Co-chair of the FHLB System OMWI Sub-group, help put as many of the MWDO Broker/Dealers as possible on Financial Transactions, particularly any SOFR-floater syndication issuance.

The Bank continues to work more often with the MWDO Broker/Dealers to help educate their clients on the FHLB System in order to create more investor interest and potentially lead to more Financial Transactions. The Bank will seek even more MWDO Broker/Dealer client visits in coordination with the OF.

There are five OF-approved MWDO Broker/Dealers not currently approved by the Bank. The Bank is already working on one to be reapproved and two have already been vetted and should be approved going forward. The remaining two will be approached to educate them about the Bank's investment needs and the potential for them to become asset approved counterparties. The Bank already works with all of these firms on the liability side.

Housing and Community Investment

Outreach - §1223.23(b)(12)(i)

In 2019 the Community Investment Group continued its outreach to the Native American communities in the district, including leading a workshop for tribal housing leaders on capacity-building at a conference for Eastern tribes in Bar Harbor, Maine. These efforts began in earnest following the [REDACTED] application to the Affordable Housing Program ("AHP") in the 2016 round and then the same project's successful re-submission in the 2017 round. The FHLBNY was honored to be able to speak at the project's ribbon-cutting ceremony in the fall of 2019. Over the course of 2019, the Community Investment Group met with key stakeholders to understand ways the other products and programs, besides the AHP, could serve tribal communities. The Bank travelled to Washington, DC to meet with the leadership of the [REDACTED] to learn about how tribes in other areas of the country educate their local lenders about the security and soundness of tribal lending, and the Bank also met regularly with the local team for [REDACTED], which offers both loan-guarantee and direct-loan programs.

In 2020, the FHLBNY will deepen this research and explore options for outreach to members and for program improvements.

The FHLBNY also continued its initiative to respond to the district need for more supportive housing for people with special needs. The Community Investment Group met repeatedly with experts from the [REDACTED] networks for supportive housing prior to the debut of the AHP scoring category for supportive housing in the 2018 round. Since then, the Bank have continued these partnerships. In 2019, the Community Investment Group attended conferences for these organizations and met in small-group discussions with their member organizations. As the FHLBNY prepares to fully implement the new AHP regulation prior to the 2021 round, it is exploring how this category, in particular, can be improved to help district partners build and sustain viable projects that provide meaningful wrap-around services for residents.

The Community Investment programs offer opportunities for diversity and inclusion beyond the direct beneficiaries or the residents. For example, the Homebuyer Dream Program (“HDP”) generates business for local lenders as well as the real estate industry in general. In 2019, the FHLBNY met with the [REDACTED], a trade organization for minority professionals, to share ways that that organization’s members could utilize the HDP to make themselves more attractive to potential clients and help their clients become more informed and secure homeowners. In a similar vein, the AHP touches not only the project sponsors and the FHLBNY’s member institutions, but also the entire project development team, from contractors across the trades to architects and attorneys. In 2019, the Community Investment Group attended the [REDACTED] to connect with minority-owned businesses and encourage them to seek roles on AHP-funded projects. This conference was part of a larger effort by the FHLBNY in this area, and the Community Investment Group will identify other similar opportunities to work with colleagues across the bank like this in 2020.

[Outcome Analysis - §1223.23\(b\)\(24\)](#)

The strategic leadership of the Community Investment programs continues to represent the FHLBNY’s commitment to diversity and inclusion. In 2019, three new members, all women, joined the Affordable Housing Advisory Council. That group now consists of nine women out of a total of 15 members. During 2019, [REDACTED], completed her two-year term as AHAC chair, and [REDACTED], was elected vice-chair, meaning she will likely become chair in 2021. The three new members of the AHAC are:

- ✚ [REDACTED], a Rochester-based developer that is an active participant in the AHP, with projects across New York State. At [REDACTED] she is responsible for leading development from conception through construction completion, focusing primarily on new construction and preservation and substantial rehabilitation developments in New York. With over a decade of multifamily development experience, [REDACTED] has worked closely with several funding agencies to develop high quality, state-of-the-art, affordable housing.
- ✚ [REDACTED]. She has over thirty-seven years of experience administering Public Housing programs with in-depth knowledge of complex State & Federal regulations. She

has broad knowledge of the principals and practices of public housing in the [REDACTED] and the operations and functions of the [REDACTED].



[REDACTED], an organization that participates in both the AHP (as a developer) and the HDP (as a housing counseling agency). The organization's mission is to invest in the housing and economic aspirations of individuals and families by providing solutions that foster and maintain vibrant, equitable, and sustainable communities.

Each of these individuals brings to the AHAC a particular expertise in the industry that will better position the Community Investment programs to respond to district needs and identify effective local partners.

Future Strategy - §1223.23(b)(25)

As discussed above, the Community Investment programs can increase economic opportunities for MWDOBs. Encouraged both by the members of the AHAC and the FHFA, the FHLBNY sought in 2019 to identify approaches to put this into practice. At this stage, there is a high level of understanding about the incentives faced by AHP projects that also receive funding from state housing finance agencies, which require or encourage developers to devote a certain percentage of their budgets to MWDOBs. But there is much less awareness about how well these incentives also affect decisions regarding projects of a smaller size, such as those in rural areas or for homeownership.

In order to build a common reference point on which to base future policies and quantitative goals, the FHLBNY will in 2020 undertake survey research with AHP project sponsors on their current initiatives in this area. In particular, the survey will ask sponsors about the incentives they already have from other funders; the composition of their existing development teams; the availability of relevant MWDOBs in their area and the depth of the market for those firms; and what extent the sponsors are using their projects to intentionally increase business opportunities in this way.

The FHLBNY will analyze this baseline data and, together with the members of the AHAC, evaluate potential approaches for additional program outreach and improvements in 2021 and beyond.

In addition to this knowledge gap about AHP projects' development teams, the Community Investment group struggles with the persistent challenge of encouraging project applications from sponsors and members located in Puerto Rico and the U.S. Virgin Islands. AHP funds typically constitute, on average, about 5 percent of a project's overall funding; therefore, the timing and viability of projects is heavily dependent on other funding sources. The ongoing delays in the federal disaster funding in the wake of Hurricanes Irma and Maria have led to a near-standstill in the development of medium- to large-scale affordable housing projects in the territories, and hence the AHP has received few recent applications.

In light of this, the Community Investment group is engaged in an ongoing initiative, begun in 2019 and continuing in 2020, to deepen relationships with the non-profit developer community and the housing finance agencies in the territories. Through repeated, in-person contacts, the FHLBNY will deliver targeted training and other technical assistance. This work is intended to put potential project sponsors in a better position for success in a future AHP round, as well as developing the capacity for these groups to sustain effective projects over the lifetime of their operations. This initiative includes the support and guidance

of the FHLBNY’s membership in Puerto Rico and the U.S.V.I., as well as of the vice-chair of the FHLBNY’s Affordable Housing Advisory Council, the leader of a non-profit housing organization in Puerto Rico.

Equal Opportunity Complaints

Employment Discrimination - §1223.23(b)(21) and §1223.23(b)(22)

There were no complaints of employment discrimination filed against the Bank by a current or potential supplier.

Basis	Process	External		Internal	Count of Complaints
		Result	Amount Paid to Claimants	Resolved through Internal Process?	

Contract Discrimination - §1223.23(b)(21) and §1223.23(b)(22)

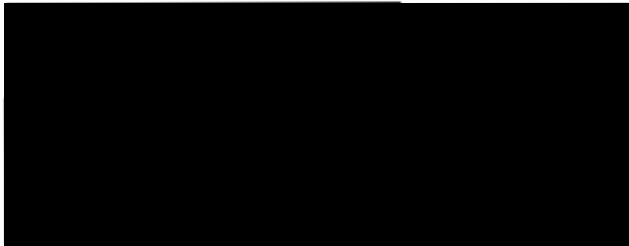
There were no complaints of discrimination filed against the Bank by a current or potential supplier.

Basis	Process	External		Internal	Count of Complaints
		Result	Amount Paid to Claimants	Resolved through Internal Process?	

Other Reports/Plans – §1223.23(b)(2) and §1223.23(b)(11)

Certification - §1223.23(a) and §1223.23(b)(20)

Certification of compliance with 1207.20 and 1207.21, together with sufficient documentation to verify compliance.



Appendix

Appendix No. 1

2019 EEO-1 Data - §1223.23(b)(1)

Job Categories	Number of Employees (Report employees in only one category)														Total Col A-N	
	Race/Ethnicity															
	Hispanic or Latino		Non-Hispanic or Latino													
	Male	Female	Male						Female							
		White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More races	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More races			
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
1.1 Executive or Senior Level Officials and Managers	2	0	9	0	0	0	0	0	2	0	0	0	0	0	13	
1.2 First or Mid Level Officials and Managers	2	3	27	1	0	8	0	3	11	6	0	7	0	1	69	
2 Professionals	14	14	67	20	1	39	0	2	28	26	0	33	0	5	249	
3 Technicians	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
4 Sales Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
5 Administrative Support Workers	1	1	4	1	0	1	0	0	2	4	0	0	0	0	14	
6 Craft Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
7 Operatives	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
8 Laborers and Helpers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
9 Service Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total	19	18	107	22	1	48	0	5	43	36	0	40	0	6	345	

Appendix No. 2

2019 Hiring Data - §1223.23(b)(4)

12 C.F.R. §1223.23(b)(4)																
FEDERAL HOME LOAN BANK OF NEW YORK																
HIRING DATA																
FOR THE PERIOD OF JANUARY 1, 2019 - DECEMBER 31, 2019																
NUMBER OF HIRES																
HIRES CATEGORIES	Overall Total (Sum of Col B thru P)	Individuals with disabilities	HISPANIC OR LATINO		NON-HISPANIC OR LATINO											
			Male	Female	MALE							FEMALE				
					White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)
A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	
Hires within category 1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hires within category 2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hires within category 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hires within category 4	54	0	2	2	16	6	0	8	0	1	6	5	0	7	0	1
Hires within category 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hires within category 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hires within category 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hires within category 8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	54	0	2	2	16	6	0	8	0	1	6	5	0	7	0	1

Category	Classification
1	Executives/Sr. Officials & Mgrs.
2	First/Mid-level
3	Officials & Mgrs.
4	Professionals
5	Trainee Professional
6	Technicians
7	Sales Workers
8	Administrative

2019 External Applicant Data - §1223.23(b)(3)

12 C.F.R. §1223.23(b)(3)																	
FEDERAL HOME LOAN BANK OF NEW YORK EXTERNAL APPLICANT DATA FOR THE PERIOD OF JANUARY 1, 2019 - DECEMBER 31, 2019																	
				NUMBER OF APPLICANT													
				HISPANIC OR LATINO		MALE						NON-HISPANIC OR LATINO					
APPLICANT CATEGORIES	Overall Total (Sum of Col B thru Q)	Did not self identify	Individuals with disabilities	Male	Female	MALE						FEMALE					
						White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
Applied within category 1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied within category 2	24	19	0	0	0	2	0	0	1	0	0	2	0	0	0	0	0
Applied within category 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied within category 4	2492	1024	35	81	53	378	123	3	317	0	34	117	102	1	189	0	35
Applied within category 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied within category 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied within category 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied within category 8	707	12	8	39	23	152	22	1	140	0	11	69	21	1	202	0	6
TOTAL	3223	1055	43	120	76	532	145	4	458	0	45	188	123	2	391	0	41

Category	Classification
1	Executives/Sr. Officials & Mgrs.
2	First/Mid-level
3	Officials & Mgrs.
4	Professionals
5	Trainee Professional
6	Technicians
7	Sales Workers
8	Administrative

Category 2 includes First or Mid-Level Officials and Managers

2019 Termination of Employment Data – Voluntary - §1223.23(b)(5)

12 C.F.R. §1223.23(b)(5)																
FEDERAL HOME LOAN BANK OF NEW YORK TERMINATION OF EMPLOYMENT DATA FOR THE PERIOD OF JANUARY 1, 2019 - DECEMBER 31, 2019																
NUMBER OF TERMINATIONS																
			HISPANIC OR LATINO		NON-HISPANIC OR LATINO											
					MALE						FEMALE					
TERMINATIONS CATEGORIES	Overall Total (Sum of Col B thru P)	Individuals with disabilities	Male	Female	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Voluntary Term's within category 1	2	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0
Voluntary Term's within category 2	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0
Voluntary Term's within category 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Voluntary Term's within category 4	15	0	1	1	3	0	0	1	0	0	5	1	0	3	0	0
Voluntary Term's within category 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Voluntary Term's within category 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Voluntary Term's within category 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Voluntary Term's within category 8	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0
Total Voluntary	19	0	1	2	5	0	0	1	0	0	6	1	0	3	0	0

Category 2 includes First or Mid-Level Officials and Managers

2019 Termination of Employment Data – Involuntary - §1223.23(b)(5)

12 C.F.R. §1223.23(b)(5)																
FEDERAL HOME LOAN BANK OF NEW YORK TERMINATION OF EMPLOYMENT DATA FOR THE PERIOD OF JANUARY 1, 2019 - DECEMBER 31, 2019																
NUMBER OF TERMINATIONS																
			HISPANIC OR LATINO		NON-HISPANIC OR LATINO											
			MALE					FEMALE								
TERMINATIONS CATEGORIES	Overall Total (Sum of Col B thru P)	Individuals with disabilities	Male	Female	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)
			A	B	C	D	E	F	G	H	I	J	K	L	M	N
Involuntary Term's within category 1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Involuntary Term's within category 2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Involuntary Term's within category 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Involuntary Term's within category 4	8	0	1	0	1	0	0	3	0	0	1	0	0	2	0	0
Involuntary Term's within category 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Involuntary Term's within category 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Involuntary Term's within category 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Involuntary Term's within category 8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Involuntary	8	0	1	0	1	0	0	3	0	0	1	0	0	2	0	0
GRAND TOTAL	27	0	2	2	6	0	0	4	0	0	7	1	0	5	0	0

Category	Classification
1	Executives/Sr. Officials & Mgrs.
2	First/Mid-level
3	Officials & Mgrs.
4	Professionals
5	Trainee Professional
6	Technicians
7	Sales Workers
8	Administrative

2019 Internal Employee Applicant Data
§1223.23(b)(7)(i) and (ii) and §1223.23(b)(8)(i), (ii), and (iii)

12 C.F.R. §1223.23(b)(7)(i) and (ii) 12 C.F.R. §1223.23(b)(8)(i), (ii) and (iii)																
FEDERAL HOME LOAN BANK OF NEW YORK INTERNAL EMPLOYEE APPLICANT DATA FOR THE PERIOD OF JANUARY 1, 2019 - DECEMBER 31, 2019																
NUMBER OF APPLICANTS																
APPLICANT CATEGORIES	Overall Total (Sum of Col B thru P)	Individuals with disabilities	HISPANIC OR LATINO		NON-HISPANIC OR LATINO						NON-HISPANIC OR LATINO					
			Male	Female	MALE			FEMALE			MALE			FEMALE		
			White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)		
A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	
Applied within category 1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied outside category 1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied and promoted within category 1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying within category 1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted after applying outside category 1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying outside category 1	2	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0
Applied within category 2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied outside category 2	2	0	0	0	1	0	0	1	0	0	0	0	0	0	0	0
Applied and promoted within category 2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying within category 2	8	0	0	0	5	0	0	0	0	0	3	0	0	0	0	0
Promoted after applying outside category 2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**2019 Internal Employee Applicant Data
§1223.23(b)(7)(i) and (ii) and §1223.23(b)(8)(i), (ii), and (iii)**

12 C.F.R. §1223.23(b)(7)(i) and (ii) 12 C.F.R. §1223.23(b)(8)(i), (ii) and (iii)																
FEDERAL HOME LOAN BANK OF NEW YORK INTERNAL EMPLOYEE APPLICANT DATA FOR THE PERIOD OF JANUARY 1, 2019 - DECEMBER 31, 2019																
NUMBER OF APPLICANTS																
APPLICANT CATEGORIES	Overall Total (Sum of Col B thru P)	Individuals with disabilities	HISPANIC OR LATINO		NON-HISPANIC OR LATINO						FEMALE					
			Male	Female	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Promoted without applying outside category 2	4	0	0	0	3	0	0	0	0	0	0	1	0	0	0	0
Applied within category 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied outside category 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied and promoted within category 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying within category 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted after applying outside category 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying outside category 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied within category 4	19	0	0	0	7	3	0	2	0	0	3	1	0	3	0	0
Applied outside category 4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied and promoted within category 4	2	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying within category 4	56	0	3	1	18	6	0	9	0	0	7	2	0	9	0	1

**2019 Internal Employee Applicant Data
 §1223.23(b)(7)(i) and (ii) and §1223.23(b)(8)(i), (ii), and (iii)**

12 C.F.R. §1223.23(b)(7)(i) and (ii) 12 C.F.R. §1223.23(b)(8)(i), (ii) and (iii)																
FEDERAL HOME LOAN BANK OF NEW YORK INTERNAL EMPLOYEE APPLICANT DATA FOR THE PERIOD OF JANUARY 1, 2019 - DECEMBER 31, 2019																
NUMBER OF APPLICANTS																
APPLICANT CATEGORIES	Overall Total (Sum of Col B thru P)	Individuals with disabilities	HISPANIC OR LATINO		NON-HISPANIC OR LATINO						FEMALE					
			Male	Female	White	Black	Native Hawaiian or Pacific Islander	Asian	American Indian or Alaskan Native	Two or more Races	White	Black	Native Hawaiian or Pacific Islander	Asian	American Indian or Alaskan Native	Two or more Races
			(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)	(not of Hispanic origin)
A B C D E F G H I J K L M N O P																
Promoted after applying outside category 4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying outside category 4	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
Applied within category 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied outside category 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied and promoted within category 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying within category 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted after applying outside category 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying outside category 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied within category 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied outside category 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied and promoted within category 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

2019 Internal Employee Applicant Data
§1223.23(b)(7)(i) and (ii) and §1223.23(b)(8)(i), (ii), and (iii)

<small>12 C.F.R. §1223.23(b)(7)(i) and (ii) 12 C.F.R. §1223.23(b)(8)(i), (ii) and (iii)</small>																
FEDERAL HOME LOAN BANK OF NEW YORK INTERNAL EMPLOYEE APPLICANT DATA FOR THE PERIOD OF JANUARY 1, 2019 - DECEMBER 31, 2019																
		NUMBER OF APPLICANTS														
		HISPANIC OR LATINO			NON-HISPANIC OR LATINO							FEMALE				
APPLICANT CATEGORIES	Overall Total (Sum of Col B thru P)	Individuals with disabilities	Male		White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)
			Male	Female	E	F	G	H	I	J	K	L	M	N	O	P
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Promoted without applying within category 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted after applying outside category 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying outside category 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied within category 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied outside category 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied and promoted within category 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying within category 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted after applying outside category 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying outside category 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied within category 8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applied outside category 8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

2019 Internal Employee Applicant Data
§1223.23(b)(7)(i) and (ii) and §1223.23(b)(8)(i), (ii), and (iii)

12 C.F.R. §1223.23(b)(7)(i) and (ii) 12 C.F.R. §1223.23(b)(8)(i), (ii) and (iii)																
FEDERAL HOME LOAN BANK OF NEW YORK INTERNAL EMPLOYEE APPLICANT DATA FOR THE PERIOD OF JANUARY 1, 2019 - DECEMBER 31, 2019																
NUMBER OF APPLICANTS																
APPLICANT CATEGORIES	Overall Total (Sum of Col B thru P)	Individuals with disabilities	HISPANIC OR LATINO		MALE						NON-HISPANIC OR LATINO FEMALE					
			Male	Female	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Applied and promoted within category 8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying within category 8	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0
Promoted after applying outside category 8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Promoted without applying outside category 8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	95	0	3	1	38	9	0	12	0	0	14	5	0	12	0	1

Category	Classification
1	Executive/Sr. Officials & Mgrs.
2	First/Mid-level
3	Officials & Mgrs.
4	Professionals
5	Trainee/Professional
6	Technicians
7	Salary Workers
8	Administrative

2019 Individuals Responsible for Managing - §1223.23(b)(9)(i)

12 C.F.R. §1223.23(b)(9)(i)																
FEDERAL HOME LOAN BANK OF NEW YORK																
NUMBER OF INDIVIDUALS RESPONSIBLE FOR MANAGING																
FOR THE PERIOD OF JANUARY 1, 2019 - DECEMBER 31, 2019																
NUMBER OF APPLICANTS																
		HISPANIC OR LATINO			NON-HISPANIC OR LATINO											
				MALE			FEMALE									
MANAGER CATEGORIES	Overall Total (Sum of Col B thru P)	Individuals with disabilities	Male	Female	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)	White (not of Hispanic origin)	Black (not of Hispanic origin)	Native Hawaiian or Pacific Islander	Asian (not of Hispanic origin)	American Indian or Alaskan Native	Two or more Races (not of Hispanic origin)
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
Total	82	0	4	3	36	1	0	8	0	3	13	6	0	7	0	1

Appendix No. 3

Procurement List of Exclusions and Exceptions



VIA EMAIL AND SUBMISSION VIA SECURE PORTAL

December 19, 2019

Sharon P. A. Levine, Director
Office of Minority Women and Inclusion
Federal Housing Finance Agency

Dear Ms. Levine,

As required by the Minority and Women Inclusion Final Rule 12 C.F.R. §1223.3(c) and §1223.3(d), we are submitting an updated list of the type of contracts that are considered exempt under §1223.3(b) and 1223.21(c) (2).

Enclosure No. 1 identifies updates to the contracts that will be (1) excluded from spend reporting; and, (2) contracts that will not include the material clause in the contract language. The updates also include information on the rationale and criteria for the exclusions.

Enclosure No. 2 contains (1) a list of bid exceptions from the Bank's usual competitive bid process and rationale; and (2) revised definitions for the competitive bid process for "Sole Source" bid exception process, as well as, the addition of the "Preferred Vendor" definition. The "Rush Order" definition is also included but remains unchanged.

Let me know if you have any questions.

Regards,

A handwritten signature in blue ink that reads "Edwin Artuz".

Edwin Artuz
Director of Diversity and Inclusion

cc: Paul Priest

FEDERAL HOME LOAN BANK OF NEW YORK • 101 PARK AVENUE • NEW YORK, NY 10178 • T: 212.681.6000 • WWW.FHLBNY.COM

Enclosure No. 1 OMWI Exclusion List

Board Approved Exclusions List	Exclude from BID Opportunity	Exclude from FHFA Reporting	Exclude from EEOC Contract Language*	Rationale for Exclusion	Criteria Used to Implement Threshold	Adverse or Negative Impact to Diverse Vendors	Comments
§1223.21 (b)(10)	§1223.21 (c)(2)	§1223.22 (d) and §1223.23(b14-b19)	§1223.21 (b)(9)	§1223.21 (b)(10)(i)	§1223.21 (b)(10)(ii)	§1223.21 (b)(10)(iii)	
Member Agreements	Yes	Yes	Yes	Not a contract with a supplier or vendor; No goods or services are received.	N/A	N/A	Update to name and includes Advances, Collateral Pledge and Security Agreement, Wire Transfer Agreements (Member and Non-Member), MPF and MAP Agreements, LC Reimbursement Agreements, Subsidiary Affiliate Pledge Agreements, and other correspondent services and member agreements specific to safely conduct business with Members.
Counterparty ISDA (International Swap and Derivatives Associations, Inc) Agreements	Yes	Yes	Yes	Not a contract with a supplier or vendor; No goods or services are received.	N/A	N/A	Contracts generally follow ISDA protocols or other financial industry norms among sophisticated financial counterparties.
Repo Agreements with Non-Member Counterparties	Yes	Yes	Yes	Not a contract with a supplier or vendor; No goods or services are received.	N/A	N/A	N/A
Letters of Credit	Yes	Yes	Yes	Not a contract with a supplier or vendor; No goods or services are received.	N/A	N/A	Not a contract. It is a negotiable instrument equivalent to cash; financial guarantee for our members to assist them to conduct business.
Advances (Loans/indebtedness by the FHLB/NY to Members)	Yes	Yes	Yes	Not a contract with a supplier or vendor; No goods or services are received.	N/A	N/A	Advances are supported by Member Agreements executed. Currently no contracts in place for this type of transaction; this is a financial construct between a Member and the Bank
Loans/indebtedness to other FHLBanks and the Office of Finance	Yes	Yes	Yes	Not a contract with a supplier or vendor; No goods or services are received.	N/A	N/A	Controlled by regulation and agreement with the Office of Finance and other FHLBanks.
Federally required sources (FRB, FDIC, Comptroller of Currency, FHFA, etc.)	Yes	Yes	Yes	Not a contract with a supplier or vendor; No goods or services are received.	N/A	N/A	Examples - payments to Federal Housing Finance Agency, and on occasion of possible emergency, Treasury.
Charitable Donations	Yes	Yes	Yes	Not a contract with a supplier or vendor; No goods or services are received.	N/A	N/A	Voluntary contributions for charity or business objectives.

Enclosure No. 1 OMWI Exclusion List

Board Approved Exclusions List	Exclude from BID Opportunity	Exclude from FHFA Reporting	Exclude from EEOC Contract Language*	Rationale for Exclusion	Criteria Used to Implement Threshold	Adverse or Negative Impact to Diverse Vendors	Comments
§1223.21 (b)(10)	§1223.21 (c)(2)	§1223.22 (d) and §1223.23(b14-b19)	§1223.21 (b)(9)	§1223.21 (b)(10)(i)	§1223.21 (b)(10)(ii)	§1223.21 (b)(10)(iii)	
Director Fees – fees paid to FHLBNY board of directors and Affordable Housing advisory council.	Yes	Yes	Yes	The MWI Regulation reporting requirement only applies to amounts paid by the Bank to a supplier. The Bank is not a party to any contract with a Director.	N/A	N/A	N/A
Professional Fees & Dues for Business and Professional Organizations	Yes	Yes	Case by Case**	No goods or services are received.	N/A	N/A	Fees for annual/periodic membership for professional networks, certifications, licenses, or similar development. Professional dues and licenses are usually fee based without a contract
Salaries and Benefits	Yes	Yes	Yes	Not a contract with a supplier or vendor; No goods or services are received.	N/A	N/A	Encompasses compensation and non-wage compensation like health care insurance, retirement plans, vacation and sick time, employees expense (overtime meals, transportation), Tuition reimbursement
Confidentiality and Non-Disclosure Agreements	Yes	Yes	Yes	No goods or services are received. Entered into before a good or service contract is negotiated or awarded.	N/A	None	N/A
Purchases of goods under \$10,000	Yes	No	Yes	Under 12 CFR 1223 Limitations; The contract clause required by § 1223.21(b)(9) apply only to contracts for services in any amount and to contracts for goods that equal or exceed \$25,000 in annual value, whether in a single contract, multiple contracts, a series of contracts or renewals of contracts, with a single vendor.	N/A	N/A	N/A
Contracts for services under \$10,000	Yes	No	No***	Governed by vendor management procedures and processes.	Governed by vendor management procedures and processes.	Case by Case****	N/A
Bid Exceptions for all purchase over \$10,000 (Applicable only for Sole Source, Preferred Vendor, and Rush Order)	Yes	No	No****	Governed by vendor management procedures and processes. Basis for exception will be documented in the Vendor Management system.	Governed by vendor management procedures and processes.	Case by Case****	N/A

*Bank will try to get the provision added to contract but it is subject to the acceptance by the vendor.

**Networking events will be governed by vendor management processes when greater than \$10,000; contracts terms and language will be negotiated and are subject to acceptance by the vendor.

***Contracts for services under \$10,000 and Bid Exception requests for goods and services greater than \$10,000 will be requested to include the FHLBNY base terms and conditions and are subject to acceptance by the vendor.

****Dependent on service; vendor may be an MWDOB and there could be no impact.

As per 12 CFR 1223 Limits: (d) Each regulated entity shall notify FHFA within thirty (30) days after any change in the types of contracts it considers exempt under § 1223.3(b) or any change in the thresholds, exceptions, and limitations the regulated entity establishes for the implementation of §1223.21(c)(2).

Enclosure No. 2 Bid Exception List

Bid Exception	Rationale for Bid Exception*
Purchase of goods and services under \$10,000	Goods and services less than \$10k are not required to go through the bid process. The minimum threshold does not preclude the Buyer or VRM from supporting the OMWI regulation in its procurement practices.
Hotels, Conference Centers and Trade Related Dinner	Depending on the location and conference requirements, bid opportunities may not always be available. The documentation of the exception shall be maintained on file and the spend reported for OMWI purposes.
Telecommunication Carriers	No opportunity to conduct competitive bids outside of those provided by landlord or property manager. The spend will be reported for OMWI purposes.
Utilities - state and local municipalities utility costs	No opportunity to conduct competitive bids; required to use landlord utility company available in the area (location specific). The spend will be reported for OMWI purposes.
Postage	No opportunity to conduct competitive bids. The spend will be reported for OMWI purposes.
Approved purchases aligned with Sole Source definition	Goods and/or services aligned with Sole Source definition and criteria. The documentation of the exception shall be maintained on file and the spend reported for OMWI purposes.
Approved purchases aligned with Preferred Vendor definition	Goods and/or services aligned with Preferred Vendor definition and criteria. The documentation of the exception shall be maintained on file and the spend reported for OMWI purposes.
Approved purchases aligned with Rush Order definition	Not enough time to conduct competitive bids. The documentation of the exception shall be maintained on file and the spend reported for OMWI purposes.

*Contracts for services under \$10,000 and Bid Exception requests for goods and services greater than \$10,000 will be requested to include the FHLB NY base terms and conditions and are subject to acceptance by the vendor.

Enclosure No. 2 Bid Exception List

Bid Exception - Procurement Definitions

Competitive Bid Process – Engagement Specific

A competitive bid process will be executed for goods and services with the values equal to or greater than \$10,000.

The minimum threshold does not preclude the Buyer or VRM from supporting the Minority and Women Inclusion regulation in its procurement practices; the Bank encourages the expansion of outreach, education efforts to engage MWDOBs in the purchase opportunities of goods and services below the established bid threshold. Whenever possible, the competitive bid process should include the request of a bid from, at a minimum, one diverse Vendor in accordance with provisions of the Bank’s “Minority and Women Inclusion Policy”.

Multiple requests of purchases that attempt to circumvent the bidding process threshold are not permitted.

Competitive Bid Exceptions

Exceptions to the bid process will include Sole Source, Preferred Vendor, and Rush Order requests and must follow the formal evaluation process.

Sole Source Vendor: A sole source vendor is one that a requisitioned good or service for which the services rendered, may include but not limited to maintenance, upgrades, enhancements, expansion of existing service, etc., which are only available from a single source, manufacturer, provider, vendor, or distributor and deemed to be the only entity capable of providing such a good or service.

Acceptance Criteria

- Independent evidence that there are no additional providers of the good or service at the time of the request

Enclosure No. 2 Bid Exception List

Bid Exception - Procurement Definitions

Preferred Vendor: A preferred vendor is one that, (unlike a Sole Source Vendor there may be other vendors that provide service) can provide for the continuation of Bank matters and would not result in duplication of cost or unacceptable delays. Consideration will be based on specific vendor attributes or ability to perform (i.e., consistent past performance, high quality product or service, or prominent professional in the industry).

Acceptance Criteria

- Evidence of contract extension: the contract under consideration is an extension of work currently being performed or has recently completed for any Bank purpose
- Successful previous engagements
- Expert in FHLB System or Bank business
- Leader in the field

Rush Order: When the need for the goods and/or services is of such urgency that following the competitive bid process would result in the Bank's business being negatively impacted, the VRM may submit a rush order request. The VRM should document their justification for requesting the Rush Order option rather than the competitive bid process.

Acceptance Criteria

- When such request is made, the Buyer will confirm if multiple bids cannot be obtained for the required goods and or services in the allotted timeframe.
- Rush Orders may be used for, but are not limited to the following:
 - o Business Continuity program (BCP)
 - o Operational/Systems/Infrastructure needs that are time sensitive which can negatively impact the Bank's business
 - o Meet contractual obligations due to events outside of the Bank's control (e.g. vendor delays)
 - o To meet a specific regulatory requirement
 - o Unforeseen event that can negatively impact the Bank's business

Note: Rush Orders should be used infrequently and not as a means to circumvent the bid process